

978328

800 NORTH THIRD STREET
P. O. BOX 1071
TERRE HAUTE, IN 47808-1071
(812) 232-3413
(800) 448-7626
(812) 232-8345 FAX
gurman.container@verizon.net
www.gurmancontainer-supply.com

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Packaging Supplies

December 29, 2003

Fouad Dababneh
U.S. EPA
Region 5 (SR-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Dababneh:

By now, I am sure you have received the letter regarding the death of Robert Gurman, president of Gurman Container & Supply Corporation.

Robert operated the company for twenty-three years. Robert's widow, Deborah, has inherited the corporation, but lacks the knowledge and ability to operate the company. I, Robert's ninety-year old father, am trying to aid Deborah in this process. The livelihoods of nine families are at stake. The employees we have are loyal and have been with us for many, many years.

Although I am under the impression that our situation is not a critical one, I feel that the EPA issue will hinder the success of selling the company at this time. I trust that the EPA is able to understand our problem and will help us in resolving it. As you know, this situation inadvertently developed prior to the EPA's existence. You have seen the plant and know that in the process of buying and selling containers and recycling aluminum cans, we are ultimately helping the environment.

I understand that the Super Fund is able to help small companies in similar situations. Help from the Super Fund would enable the company to be placed on the market for sale.

Sincerely,


I. Gurman

RIPA

Reusable Industrial Packaging Association



GURMAN CONTAINER & SUPPLY CORPORATION

Established 1922

CONTAINERS FOR INDUSTRY

P. O. Box 1071

Terre Haute, Indiana 47808-1071



FOUAD DABABNEH

U.S. EPA

REGION 5 (SR-6J)

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

60604+3511





Mr. Richard Molini
Project Manager
Indiana Department of Environmental Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

June 25, 1999

SUBJECT: Cost Estimate, Terre Haute Municipal Well Field Groundwater Project

Dear Mr. Molini:

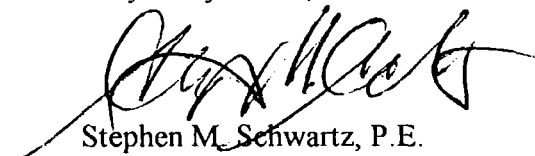
Versar and its subcontractor, Bowser Morner, propose to perform the subject project for a total cost of \$154,050.90. The specific scope of the sub-surface exploration work is expected to be:

- drill 14 each - 2 inch PVC wells, each 100 feet deep
- drill 14 each - 2 inch PVC wells, each 45 feet deep
- drill 12 each soil borings, each 25 feet deep

We propose to sink 4" borings using sonic technology, provide a decontamination rig and tooling, provide above-ground well protection, and develop each of these wells once complete. Our cost breakdown is shown in Table 1. It is estimated that the work will take 15 to 20 working days to complete, assuming 9 to 11 hours per day at the job site.

If you have any questions or comments please do not hesitate to give me a call. Thanks very much for the opportunity to assist.

Very Truly Yours,



Stephen M. Schwartz, P.E.
Program Manager

cc: L. McLeod
J. Strauss

Table 1: Unit Cost Estimates*

Item Description	Units	Unit Price (\$)	Estimated Quantity	Total Price (\$)
Mobilize/demobilize men and equipment	miles	5.90	375	2,212.50
Subsistence per person per day (3 people)	person-days	88.50	45	3,982.50
6" sonic with 4" core	feet	35.40	2,330	82,482.00
Grout sonic boring (6" or 8")	feet	7.08	300	2,124.00
2" PVC well, labor plus material	feet	14.16	2,030	28,744.80
Well development (1 person)	labor-hours	100.30	60	6,018.00
Concrete pad (2' x 2' x 6")	each	88.50	28	2,478.00
Steel guard pipe (square: 4" x 5')	each	177.00	28	4,956.00
Steel guard post (4" x 6')	each	59.00	112	6,608.00
Self-contained deconam. unit	days	147.50	15	2,212.50
Rig downtime for decontamination	hours	413.00	8	3,304.00
Temporary decontamination pad	each	413.00	1	413.00
Indiana well logs	each	29.50	28	826.00
DOT drums filled	each	47.20	140	6,608.00
Administrative oversight	labor-hours	108.16	10	1,081.60
TOTALS:				\$154,050.90

* Unit cost estimates assume: Level "D" personal protective equipment, no significant time required to gain access to the site, no significant stand-by time, and no surface-set road boxes.



Facsimile Transmittal

To: Rich Molini FAX #: 308-3063
 Attn: _____ Re: Site Investigation
 # Of Pages Including This Cover: 3 Date: 7-27-99
 From: QEP ☐ Hardcopy will be sent under separate cover

REMARKS:

Quality Environmental Professionals, Inc.
 1445 C Brookville Way • Indianapolis, IN 46239
 317/351-4255 • fax 351-4265



Confidentiality Notice: The materials enclosed with this facsimile transmission are private and confidential and are the property of the sender. The information contained in the materials is privileged and is intended only for the use of the individual(s) or entity(ies) named above.

If this transmission is incomplete or illegible please contact us as soon as possible.



July 27, 1999

Mr. Rich Molini
Indiana Department of Environmental Management
OER/Site Investigation Section
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

RE: Site Investigation Project
Well Surveying
Terre Haute, Indiana
Proposal 99102

Dear Mr. Molini:

Quality Environmental Professionals, Inc. (QEPI) is pleased to submit this cost estimate to survey 22 wells at the Indiana American Water Company in Terre Haute, Indiana. Our services will be provided under the terms of the Master Agreement between the Indiana Department of Environmental Management (IDEM) and QEPI.

Scope of Work and Approach

IDEM has requested that a series of 11 well nests be surveyed. The survey point of each monitoring well is the top of the casing. The project is to be completed during the week of August 9, 1999. The required accuracy for the measurements is +/- .01 feet.

QEPI will conduct the surveying during one day of field operations. Surveying operations will be conducted by QEPI staff. The surveying will be conducted using a Topcon Autolevel and a survey rod with special targets for accuracy. Readings will be recorded in a field logbook. Once the surveying is completed, QEPI will complete a written report with the results of the surveying. The report and logbook will then be given to the IDEM project manager.

Assumptions

- IDEM will provide QEPI with a benchmark with accurate elevations.
- The survey work will not be conducted during rain.
- Well covers will be unlocked and removable. Any locked wells will be cut and IDEM will



Mr. Rich Molini
 Cost Estimate for Surveying
 July 28, 1999
 Page 2

- be responsible for replacing the locks.
- Traffic control will not be required.

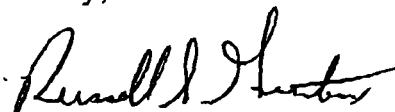
COST ESTIMATE


The following table is a breakdown of the cost to conduct the previously mentioned scope of work.

Task & Hours	Personnel	Rate	Total
<i>Travel</i>			
-3 hours	Project Manager	\$75	\$225
-3 hours	Staff Engineer	\$55	\$165
<i>Surveying</i>			
-4 hours	Project Manager	\$75	\$300
-4 hours	Staff Engineer	\$55	\$165
<i>Equipment</i>			
-Level/day	-	\$70	\$70
-Survey Rod/day	-	\$10	\$10
-Vehicle	-	\$45	\$45
<i>Per diem</i>			
1	Project Manager	\$13	\$13
1	Staff Engineer	\$13	\$13
<i>Report</i>			
-2 hours	Project Manager	\$75	\$150
-0.5	Senior Reviewer	\$110	\$55
TOTAL COST			\$1,211.00

If you have any questions, please contact one of the undersigned at your convenience. QEPI appreciates this opportunity to provide quality environmental services.

Sincerely,


 Russell S. Greator
 Hazardous Waste Manager


 Robert K. Reynolds, CPG
 Hydrogeologist
 Senior Project Manager

CERCLIS EXECUTIVE SUMMARY-STATE LEAD

EPA ID# 016648230

WINDSHIELD SURVEY X YES NO

Original Company Name: I. Gurman and Sons, Inc.

Revised Company Name: _____

Alias Names: _____

Original X Address 800 North Third Street

Corrected	Terre Haute, Indiana 47808
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Vigo County 167 County Code 7 Cong. Dist.

Coordinates: 39 28' 35" N Latitude 087 24' 50" W Longitude

 Landfill Generator Treatment, Storage, Disposal (TSD)

Transporter	<input checked="" type="checkbox"/> Other: Notified as RCRA non-handler
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PRIORITY ASSESSMENT: X HIGH MEDIUM LOW NO FURTHER ACTION (NONE)

CLASS:

X I-STATE LEAD II-REM/FIT LEAD III-REM/FIT LEAD IV OTHER:

State Accompanies

Limited On-site

100

FIT

State Involvement

䷀ ䷁ ䷂ ䷃ ䷄ ䷅ ䷆ ䷇ ䷈ ䷉ ䷊ ䷋ ䷌ ䷍ ䷎ ䷏ ䷐ ䷑ ䷒ ䷓ ䷔ ䷕ ䷖ ䷗ ䷘ ䷙ ䷚ ䷛ ䷜ ䷝ ䷞ ䷟ ䷠ ䷡ ䷢ ䷣ ䷤ ䷥ ䷦ ䷧ ䷨ ䷩ ䷪ ䷫ ䷬ ䷭ ䷮ ䷯ ䷰ ䷱ ䷲ ䷳ ䷴ ䷵ ䷶ ䷷ ䷸ ䷹ ䷺ ䷻ ䷼ ䷽ ䷾ ䷿ ䷀ ䷁ ䷂ ䷃ ䷄ ䷅ ䷆ ䷇ ䷈ ䷉ ䷊ ䷋ ䷌ ䷍ ䷎ ䷏ ䷐ ䷑ ䷒ ䷓ ䷔ ䷕ ䷖ ䷗ ䷘ ䷙ ䷚ ䷛ ䷜ ䷝ ䷞ ䷟ ䷠ ䷡ ䷢ ䷣ ䷤ ䷥ ䷦ ䷧ ䷨ ䷩ ䷪ ䷫ ䷬ ䷭ ䷮ ䷯ ䷰ ䷱ ䷲ ䷳ ䷴ ䷵ ䷶ ䷷ ䷸ ䷹ ䷺ ䷻ ䷼ ䷽ ䷾ ䷿

Priority Justification and State Comments Regarding:

X PA	SI	Follow-up SI	RPS	HRS
------	----	--------------	-----	-----

I. Gurman and Sons, Inc. operates a drum reconditioning and recycling facility in this Terre Haute location. The process consists of water washing, inspection, and repair of all types of drums. The process wash water is discharged to the city sewer. There are approximately 1000 drums (ostensibly empty) currently on the site. A noticeable solvent odor was encountered during a July 22, 1987, windshield survey.

The types of activities and wastes handled, as well as, the close proximity to the contaminated Terre Haute municipal well supply make this site a suspected potential source of the TCE and PCE contaminants. The municipal wells are located in a surficial aquifer approximately 600' west of this operation and service 75,000 residents.

STATE INVOLVEMENT

C Preliminary Assessments C Site Inspection C follow-up Site Inspection
C Responsible Party Search C Hazard Ranking System (HRS)

* COMPLETE DOCUMENTS (C) REVIEW DOCUMENTS (R)

Prepared by: Richard Molini

Phone: 317/232-8932 Date: 9/28/87

Activity Time: 15 Hours



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER			
I. Gurman and Son, Inc.		800 North Third Street			
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Terre Haute	IN	47807	Vigo	167	7
09 COORDINATES LATITUDE		LONGITUDE			
39° 28' 35" N		087° 24' 50" W		Terre Haute Quadrangle	
10 DIRECTIONS TO SITE (Starting from nearest public road)					
Sreet Address - Third Street is US Hwy. 41					

III. RESPONSIBLE PARTIES

01 OWNER (if known)		02 STREET (Business, mailing, residential)			
I. Gurman and Son, Inc.		800 North Third Street, P.O. Box 1071			
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER	Contact	
Terre Haute	IN	47807	(812) 232-3413	Bob Gurman	
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)			
same as above					
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		
			()		
13 TYPE OF OWNERSHIP (Check one)					
<input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL					
<input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)					
<input type="checkbox"/> A. RCRA 3001 DATE RECEIVED: ____/____/____ MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ MONTH DAY YEAR <input checked="" type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION		BY (Check all that apply)			
<input type="checkbox"/> YES DATE ____/____/____ MONTH DAY YEAR		<input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR			
<input checked="" type="checkbox"/> NO		<input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify)			
CONTRACTOR NAME(S): _____					
02 SITE STATUS (Check one)		03 YEARS OF OPERATION			
<input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		1947 Present <input type="checkbox"/> UNKNOWN			
		BEGINNING YEAR ENDING YEAR			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED					
Trichloroethylene and tetrachloroethylene Pesticides Other organic chemicals					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION					
Trichloroethylene and tertrachloroethylene have been identified in the Terre Haute municipal well water supply. The municipal wells are located approximately 600' west of this site. Accidental or routine releases of the above mentioned substances*					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)			
<input checked="" type="checkbox"/> A. HIGH (Inspection required promptly)	<input type="checkbox"/> B. MEDIUM (Inspection required)	<input type="checkbox"/> C. LOW (Inspect on time available basis)	<input type="checkbox"/> D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT		02 OF (Agency/Organization)		03 TELEPHONE NUMBER	
Harry E. Atkinson		IDEM		(317) 232-8927	
04 PERSON RESPONSIBLE FOR ASSESSMENT		05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Richard Molini		IDEM	OSHW	(317) 232-8932	9 28 87 MONTH DAY YEAR

EPA FORM 2070-12 (7-81)

*from this site would impact the municipal supply source.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: 75,000

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☒ POTENTIAL

☒ ALLEGED

Poor waste handling practices or routine or accidental spills could have released TCE or PCE to ground surface and thereby to shallow groundwater. Subsurface geologic strata, alluvial sand and gravel, are conducive to rapid contaminant migration.

01 ☐ B. SURFACE WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☒ POTENTIAL

☐ ALLEGED

Not observed, yet the shallow groundwater aquifer discharges locally to the Wabash River southwest of the area.

01 ☐ C. CONTAMINATION OF AIR

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

Not observed, yet the above mentioned contaminant may still be volatilizing from the site. A solvent odor was noticeable during the windshield survey on July 22, 1987.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

Not observed.

01 ☐ E. DIRECT CONTACT

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

Not observed.

01 ☐ F. CONTAMINATION OF SOIL

03 AREA POTENTIALLY AFFECTED: .5
(Acres)

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☒ POTENTIAL

☐ ALLEGED

01 ☐ G. DRINKING WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: 75,000

02 ☒ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

The Terre Haute (Indiana America Water Company) municipal wells display single digit part per billion concentrations of TCE and PCE. The well field is the major source of the potable water for the distribution system.

01 ☐ H. WORKER EXPOSURE/INJURY

03 WORKERS POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

Not observed.

01 ☐ I. POPULATION EXPOSURE/INJURY

03 POPULATION POTENTIALLY AFFECTED: _____

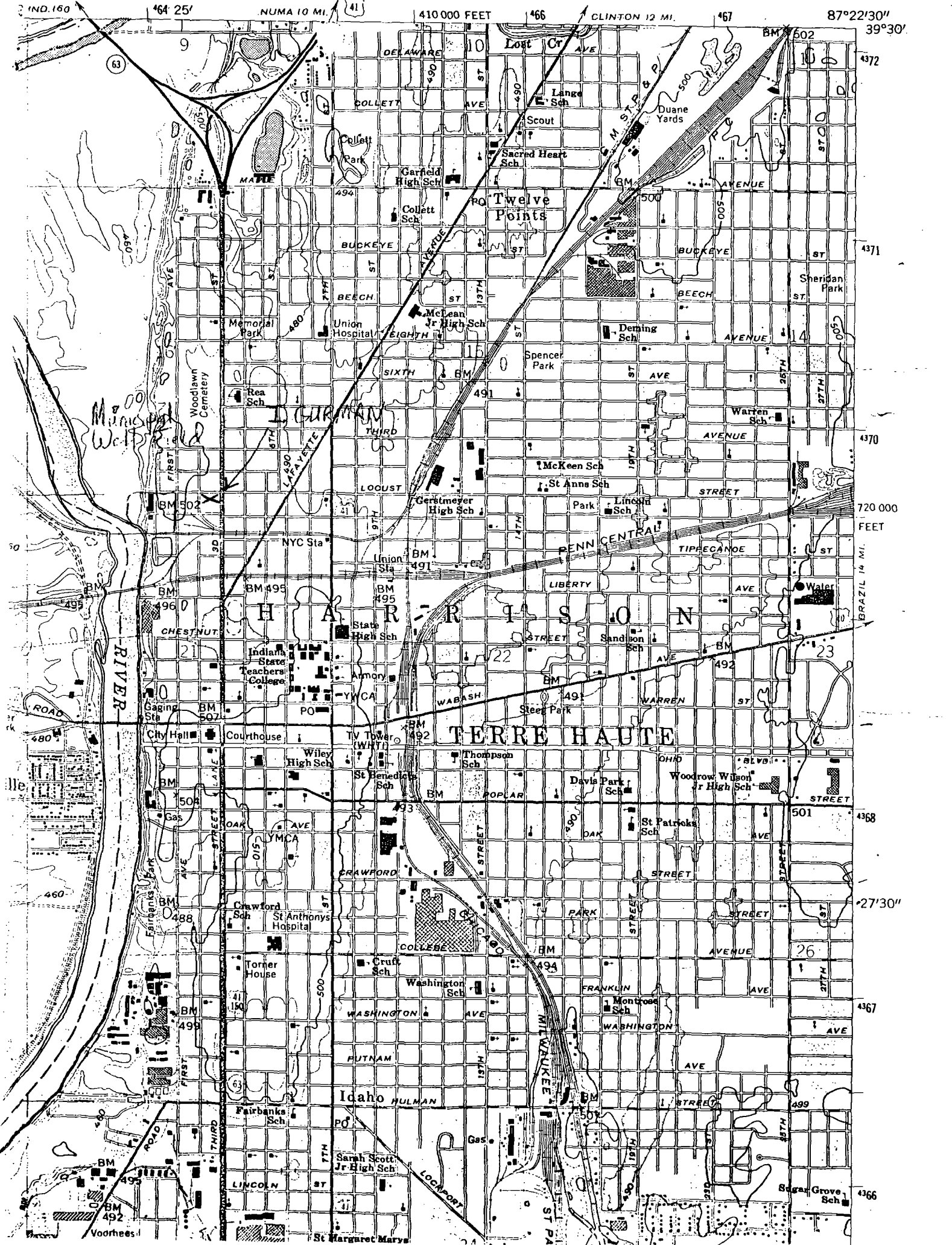
02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

Not observed.



SITE INSPECTION
WORK PLAN FOR

SITE NAME I. Gurman and Sons

LOCATION 800 North Third Street, Terre Haute

EPA ID# IND016648230

Prepared by
Site Investigation Section
Indiana Department of Environmental Management

Preparer Rich Molini Date 21 May 1999

Reviews and Approvals

Project Manager

Rich Molini

Date 8 June 99

~~Site Investigation Chief~~

SEMT

Timothy R. Johnson

Date 10 June 99

Geology

Billy E. Giles

Date 9 June 99

Chemical Evaluation

Date _____

EPA

Date _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
FIELD INVESTIGATION TEAM
WORK PLAN

SECTION I. General Information

SITE NAME I GURMAN and Sons

LOCATION 800 North Third Street Terre Haute

PROPOSED DATE OF INSPECTION _____

ESTIMATED FIELD HOURS 40 hours

PROJECT OBJECTIVE The objective of this project will be to aid in determining the nature and extent of the volatile organic compounds in the subsurface near the municipal well supply. This will be accomplished by conducting soil borings and implacing shallow and deep monitoring wells in the study area.

PROJECT DESCRIPTION It is anticipated that 4 deep wells, 4 shallow wells and 4 soil borings will be completed at this site for this project. VOC analysis will be performed on approximately 20 soil and 10 water samples.

BACKGROUND REVIEW PERFORMED YES X NO _____

Preliminary HRS Route Score GW 100 SW _____ AIR _____
DC _____ F&E _____
Total
Score (Sm) 50

Projected HRS score with
field work GW _____ SW _____ AIR _____
DC _____ F&E _____
Total
Score (Sm) _____

INSPECTION PRIORITY LOW _____ MEDIUM _____ HIGH X

SECTION II. Site/Waste Characteristics

TYPE OF FACILITY Drum Reconditioning and Recycler

SITE DESCRIPTION Flat urban landscape about 1 acre. Former drum piles no longer present. Newer buildings replace some of the ones present in 1989. The entire site as well as the process areas are potential sources of solvent contamination.

DISPOSAL METHODS Spills and leaks as well as process water contamination from washing and rinsing.

FEATURES OF DISPOSAL AREA Flat urban soil surface compromised by spills and leaks.

HISTORY (complaints, agency, previous action) None

STATUS Active X Inactive Unknown

WASTE TYPE(s) Liquid X Solid Sludge Gas Unknown

CHARACTERISTICS Corrosive Ignitable Radioactive

Volatile X Toxic X Persistent

Reactive Incompatible Unknown

Other

SECTION III. Hazard Evaluation

SUBSTANCES BELIEVED TO BE PRESENT Volatile organic compounds
including PCE and TCE

SECTION IV. Field and Laboratory Work Required

Establish Perimeter	Yes <u>X</u>	No <u> </u>
Map	Yes <u>X</u>	No <u> </u>
Identify Contamination Zone	Yes <u>X</u>	No <u> </u>
Geophysical Work	Yes <u> </u>	No <u>X</u>

If Yes, specify

Drilling	Yes <u>X</u>	No <u> </u>
Determine location of wells	Yes <u>X</u>	No <u> </u>
Installation plans attached	Yes <u>X</u>	No <u> </u>

Sampling Required	Yes <u>X</u>	No <u> </u>
Identify locations	Yes <u>X</u>	No <u> </u>
Map attached	Yes <u>X</u>	No <u> </u>

If No, attach information
 Approximate locations at this time

Perform Site Recon	Yes <u>X</u>	No <u> </u>
--------------------	--------------	----------------

If No, attach information

Designated Laboratory

CLP BS

Sample Type (soil, water etc.)	Number of Sample Points	Depth	TYPE OF ANALYSIS BOTTLES			
			40 ml vials	1 Liter Amber Glass	1 L Plastic	250 ml Amber
GW	10	40-100	20			
Soil	20	0-100	40			

Duplicates:

*MS/MSD double volume for organics,
one in twenty per matrix; identify on C-O-C
Blank
Background (soil/sed.)

Field Equipment Requirements

<u>Item</u>	<u>Quantity</u>
1. Hnu	1
2 Stainless steel scoops	
3 mixing bowls	
4 baggies	

SUMMARY OF PROCEDURES AND ADDITIONAL COMMENTS: *(Sample point selection method)*

Boring and well locations were determined in office from stratigraphic data

SITE SAFETY PLAN

PREPARED BY: Rich Molini
APPROVAL:

Section I. Site Safety Work Plan

Site Secured	<u>Yes</u>	No
Perimeter Identified	<u>Yes</u>	No
Contamination Zones Identified	<u>Yes</u>	No

Level of Protection	A	B	<u>C</u>	D	Unknown
---------------------	---	---	----------	---	---------

Modifications

All personnel will bring all health and safety equipment and prepare and respond as necessary

Equipment and Materials

NA

Site Entry Procedures

NA

Exit and Decon Procedures

NA

Method of Wastes Disposal Generated as a Result of Inspection

All boring and well cuttings will be drummed and left on site and a determination of the nature of disposal will be made after sample analysis.

Personnel Required

<u>Name</u>	<u>Job Title</u>	<u>Function</u>
Rich Molini	Project Mnger	Stratigraphic intrptn And oversight
Billy Giles	Geologist	Stratigraphic intrptn And oversight
Jerry O'Callaghan	Team Member	Stratigraphic intrptn And oversight
Jeanne Burns	Team member	Stratigraphic interptn And oversight

Work Limitations

Section II. Emergency Information

Site Resources (check applicable)

Water X
Telephone X
Radio X
Other (specify)

Local Resources

	<u>Name</u>	<u>Number</u>	<u>Address</u>
Ambulance	AID Ambulance	232-7067	
Hosp. Emerg.	Union Hosp	238-7523	
Police Dept.	TH Police	232-1311	
Fire Dept.	TH Fire	232-1311	

Airport

Directions to Hospital (attach map) Locust east to 7th St, north on 7th St 5 blocks to 8th Ave and hospital

Section III. Emergency Contacts

Dr. Raymond Harbison	501/661-5756 or 5757
MED-TOX	501/370-8203
Regional Safety Coord.-Don Woods	312/985-3816
Regional Health Maint. 8-5 daily	312/832-8820
Epidemiologist-Dollis Wright	317/383-6554
CDC	404/329-2888 or 3311
EPA Emergency Response	312/353-2318
Indiana State Emergency Response	317/233-7745
Louise Fabiniski (ATSDR-EPA)	312/886-0840
Indiana State Chemist	317/494-1492

Department of Environmental Management
Quality Assurance Records Log

Site Name _____	Record and Documentation (check all that apply)
Site ID Number _____	General Work Plan _____
	Safety Plan _____
	Log Books _____
	Photos _____
	Chain of Custody _____
	Traffic Reports _____
	Field Collected Information _____
	Analytical Information _____
	QA _____
	Technical Review _____
	Editorial Review _____
	QA Report _____
	QA Record _____
	Calibration Record _____
	Preinspection Meeting _____
Drilling Logs _____	
Correspondence _____	
Reports _____	

Record Description

Document No.

CHEMICAL EVALUATION

Chemical Name PCE

Reference consulted (check all applicable)

NIOSH _____ CHRIS _____ MERCK _____ SAX _____ ITI _____

POCKET GUIDE TO CHEMICAL HAZARDS _____

OTHER (specify) _____

Chemical Properties

Formula _____

Molecular Weight _____

Physical State _____

Solubility in H₂O _____

in Benzene _____

other (specify) _____

Boiling Point _____

Flash Point _____

Vapor Pressure _____

Melting Point _____

Specific Gravity Density _____

Flammable Limits LEL _____

UEL _____

Odor Threshold _____

PEL or TLV

ppm SKIN

ppm ORAL

MG/M³ INHALATION

HUMAN/OTHER (specify)

LD50/LC50

Dermal Toxicity

Inhalation Toxicity

Decon/clean up procedures, recommendation

Health hazards and recommendations, target organs, etc.

CHEMICAL EVALUATION

Chemical Name ICE

Reference consulted (check all applicable)

NIOSH ____ CHRIS ____ MERCK ____ SAX ____ ITI ____

POCKET GUIDE TO CHEMICAL HAZARDS ____

OTHER (specify) _____

Chemical Properties

Formula _____

Molecular Weight _____

Physical State _____

Solubility in H₂O _____

in Benzene _____

other (specify) _____

Boiling Point _____

Flash Point _____

Vapor Pressure _____

Melting Point _____

Specific Gravity Density _____

Flammable Limits LEL _____

UEL _____

Odor Threshold _____

PEL or TLV

ppm SKIN

ppm ORAL

MG/M³ INHALATION

HUMAN/OTHER (specify)

LD50/LC50

Dermal Toxicity

Inhalation Toxicity

Decon/clean up procedures, recommendation

None

Health hazards and recommendations, target organs, etc.

SAMPLING EQUIPMENT LIST
(not inclusive)

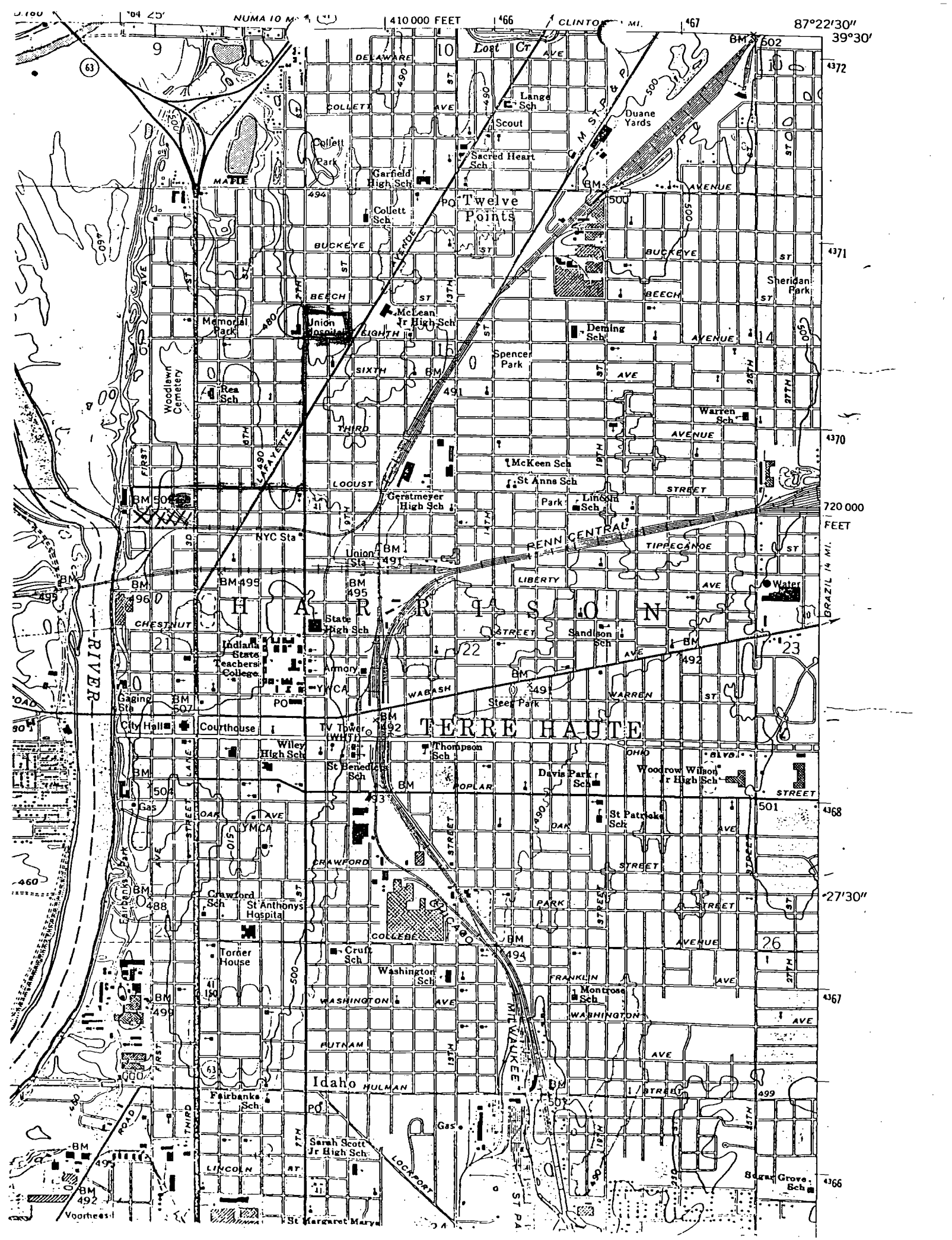
QUANTITY

ITEM

_____	2" Teflon Bailers
_____	4" Teflon Bailers
_____	Fultz Pump (portable well pump)
_____	Keck Pump (1-portable, 2-auto battery)
_____	Well Wizard Bladder Pumps
_____	Well Wizard Controllers
_____	Submersible Pump
_____	Generators
_____	Peristaltic Pumps
_____	Filter Stand Apparatus
_____	Filter Paper (.45 um)
_____	Static Water Level Indicator
_____	Hydrolab (pH, SC, temp meter)
_____	Hydac (pH, SC, temp)
_____	Orion (pH meter)
_____	Power Auger
_____	Small Auger
_____	Coliwasas (disposable)
_____	Shallow Sludge Sampler (PACS)
_____	Grain Thief (granular solid sampler)
_____	Sludge Core Sampler, Wildco (& inserts)
_____	Soil Core Sampler, Back-Saver
_____	Stainless Steel Inserts, Back-Saver
_____	Acetate Zero Contamination Inserts
_____	Stainless Steel Spatulas
_____	Post Hole Digger
_____	Shovel, Pointed Tip
_____	Trier Sampler
_____	Ponar Grabs, Wildco
_____	Bacon Bombs, Wildco
_____	Flint Glass/Plastic Tubes, 3/8" ID
_____	Solvent/Waste Containers
_____	Pond Sampler
_____	HNu Photoionizer
_____	Gastechtor
_____	Geiger Counter
_____	Plastic Scoops (disposable)
_____	Metal (chrome plated) Trowels
_____	Stainless Steel Scoops
_____	100 ft. Steel Tape Measure
_____	Rock Pick, 20 oz. Chisel Edge
_____	Tool Boxes
_____	Stainless Steel Buckets
_____	Stainless Steel Pouring Beakers
_____	Plastic Buckets
_____	Pressure Sprayers
_____	Fire Extinguishers

QUANTITY

Stretch Film Dispenser
Radio Head Sets W/Throat Mikes
X-Met 840 X-Ray Fluorescence Analyzer
Self-Contained Breathing Apparatus
MSA Custom 4500 Air Mask
Air Cylinder
Ultravue Face Piece
MSA Respirator, Ultra-Twin, Full Face
Bailer, For 2 Inch Well
MSA Respirator Cartridges
Span Gas Cylinder For Calibration Part #83-101-351
Regulator For Use With The Span Gas Cylinder
Calibration Kit For Gastechtor Model #1314
FUJI TW 300 Camera, 35mm
Case For FUJI TW 300
Gastechtor, Model #1314, STK #72-0135
Ponar Grab Dredge, 9" X 9"
Steel Cable, For Dredge
Auger Soil Sampler With "T" Handle
Saran X Level C Outerwear
Boot Covers NUKE BOOT 2W
Gloves, Disposable SILVER SHIELD
Hard Hats
Cooler
Duct Tape
Trash Bags
Sheet Plastic for Decon
Post Hole Digger
Weed Whip
Personal Copier
Toner Cartridge
5L Carrying Bag
Soil Sampling Kit
Film
Paperwork
Seals
Labels
Trash Bags
Pens
Maps
40-ml VOA Bottles
1-L Plastic Bottles
1-L Glass Amber Bottles (wide mouth ____
narrow mouth ____)
8 oz. Jars



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

EXPANDED SITE INSPECTION REPORT

FOR

Machine Tool Service

TERRE HAUTE
INDIANA

U.S. EPA ID: IND006034466

JULY 15, 2003

Signature Page
for
Machine Tool Service
TERRE HAUTE
INDIANA

U.S. EPA ID: IND006034466

Prepared By: _____ Date: _____
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SECTION I

INTRODUCTION

The Indiana Department of Environmental Management (IDEM), Office of Land Quality (OLQ), Site Investigation Section, under a Cooperative Agreement (CA) with the United States Environmental Protection Agency (U.S. EPA), Region V Office, has been funded to perform Expanded Site Inspections (ESI) for selected sites listed in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS). These inspections and assessments are conducted under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 and the Superfund Amendments and Reauthorization Act (SARA) of 1986. Sites eligible for ESIs include those sites for which the Screening Site Inspection (SSI) concluded additional information was necessary to determine site resolution and final disposition. The objective of the ESI is to collect that data necessary for evaluating the site utilizing the Hazard Ranking System and to determine if a remedial or removal action may be appropriate to protect human health and/or the environment.

The Site Investigation Section of IDEM was given approval from the US EPA to conduct an ESI at the Machine Tool Service Site (MTS) in Terre Haute, Indiana. The site was discovered in 1987 by the IDEM via information submitted by the Indiana American Water Company of Terre Haute (IAWC) and evaluated through a preliminary assessment (PA) completed by Richard Molini of the IDEM on 12/15/87. An SSI had been completed by IDEM in September of 1988 at MTS. Because this ESI has broader local implications for a public water supply and the project involved the installation of monitoring wells and soil borings, this ESI was conducted in conjunction with the

ESIs for two other adjacent sites, I Gurman and Son (IND016648230) and BiState Products (IND155169451).

SECTION II

SITE BACKGROUND

2.1 Introduction

This section includes information obtained from the SSI, ESI work plan, MTS site representative interviews, IDEM files, and interviews with personnel of the Indiana American Water Company Terre Haute Facility (IAWC).

2.2 Site Description

The MTS site is located near the Wabash River in central Terre Haute in far western Indiana. Machine Tool Service, located at 117 Elm Street in Terre Haute, Indiana (Figure 2-1) has since 1967 rebuilt machine tools and equipment. The site is approximately 4.5 acres in size and represents a relatively low relief urban landscape. The MTS operations are housed in the main building on the west side of the property which is about 15,000 square feet in area. A smaller 30x60 foot warehouse from the former bulk petroleum operations still exists on the east side of the property. Stoddard solvent is currently stored in above ground tanks on the south side of the main building.

The soils are naturally very sandy. Some areas, particularly on the western areas of the site appear to be predominantly fill composed primarily of a slag material.

The geographic coordinates of the area lie between 39° 28'32.64" and 39° 28'35.90" north latitude and between 87° 24'50.57" and 87° 25'00.38" west longitude. The site is located on the Terre

Haute West , Indiana U.S.G.S. Quadrangle. The site is bounded to the north light industrial, multi-family housing, and a park to the east by commercial and residential area, and to the south and west by an industrial area.(refer to Site Location Map, Figure 2-1, Site Features Map, Figure 2-2 and Potential Source Area Map, Figure 2-3.

2.3 Site History

As mentioned in the site description, the site has since the late 60s been utilized for machine tool repair and rebuilding. In the past the owner/operator likely used chlorinated solvents for machining and parts degreasing and cleaning. The eastern two-thirds of the site was formerly a Sinclair Oil bulk plant similar to the Texaco bulk plant which was located at the BiState Products site adjacent to and north of MTS. Petroleum products (gasoline, oil, possibly solvents , etc) were stored there in above ground tanks prior to their distribution to local area service stations. Evidently the bulk plant became too small to be of use and was discontinued in the early 1960s. Prior to 1967 the eastern portion of the site was a railroad locomotive repair and rebuilding facility. Locomotives were brought in on the former spur and serviced. Locomotive service facilities likely utilized a plethora of different types of solvents for cleaning and parts washing.

The most likely potential source areas for the volatile substances detected in the municipal well supply were determined to area F south of the main building where solvents were stored and the tank farm area G on the east boundary of the site(See Figure 2-3)page 2-6). The wells and borings were located to primarily address those possibilities and Table 2-1 displays the logic for the implacements for the local area and MTS. The soil and groundwater samples from the wells and the

soil borings were collected to aid in determining if the VOC contaminants detected in the IAWC well field could be attributable to the suspected source areas F and G or any other areas of this site.

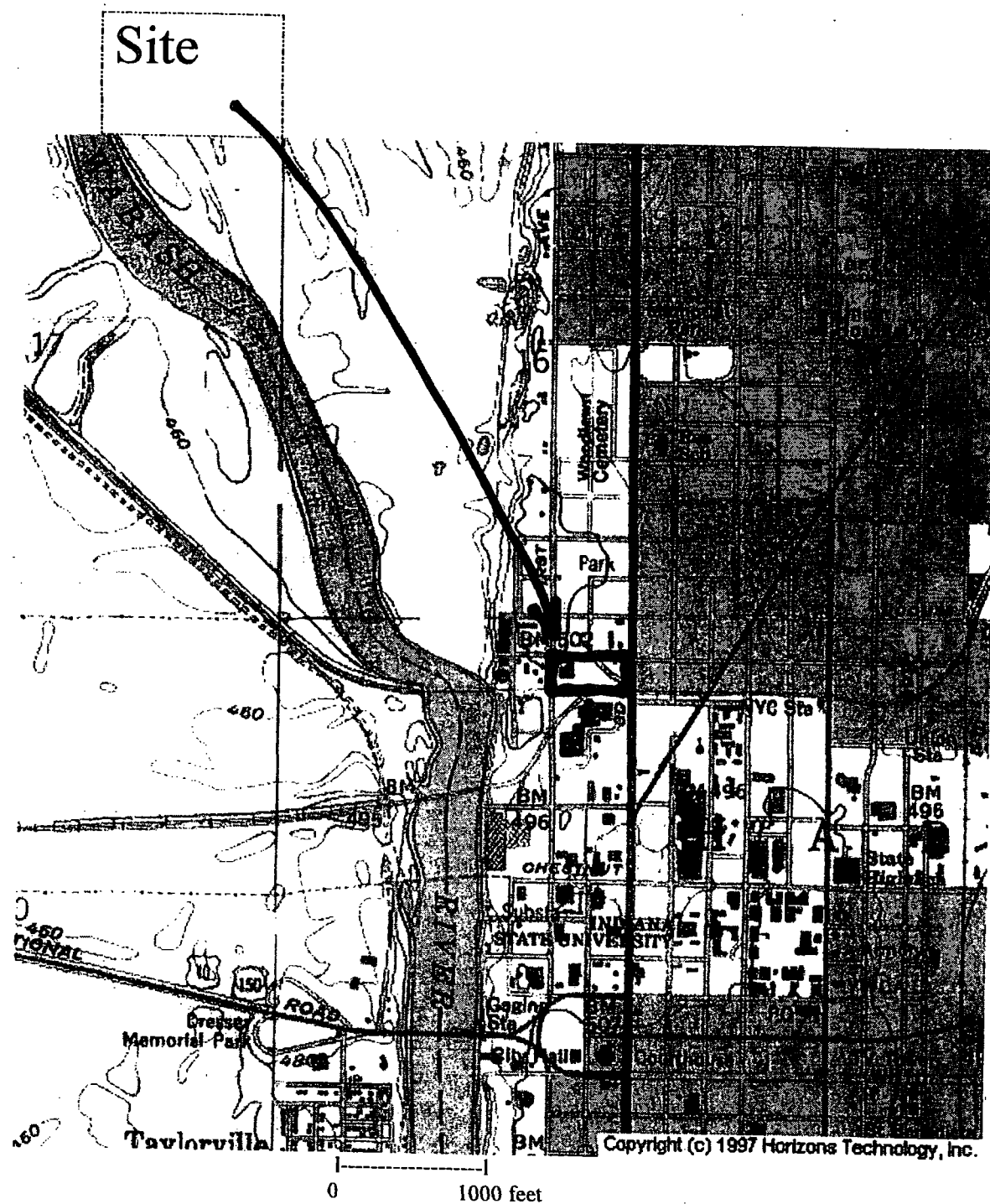


Figure 2-1
Page 2-4

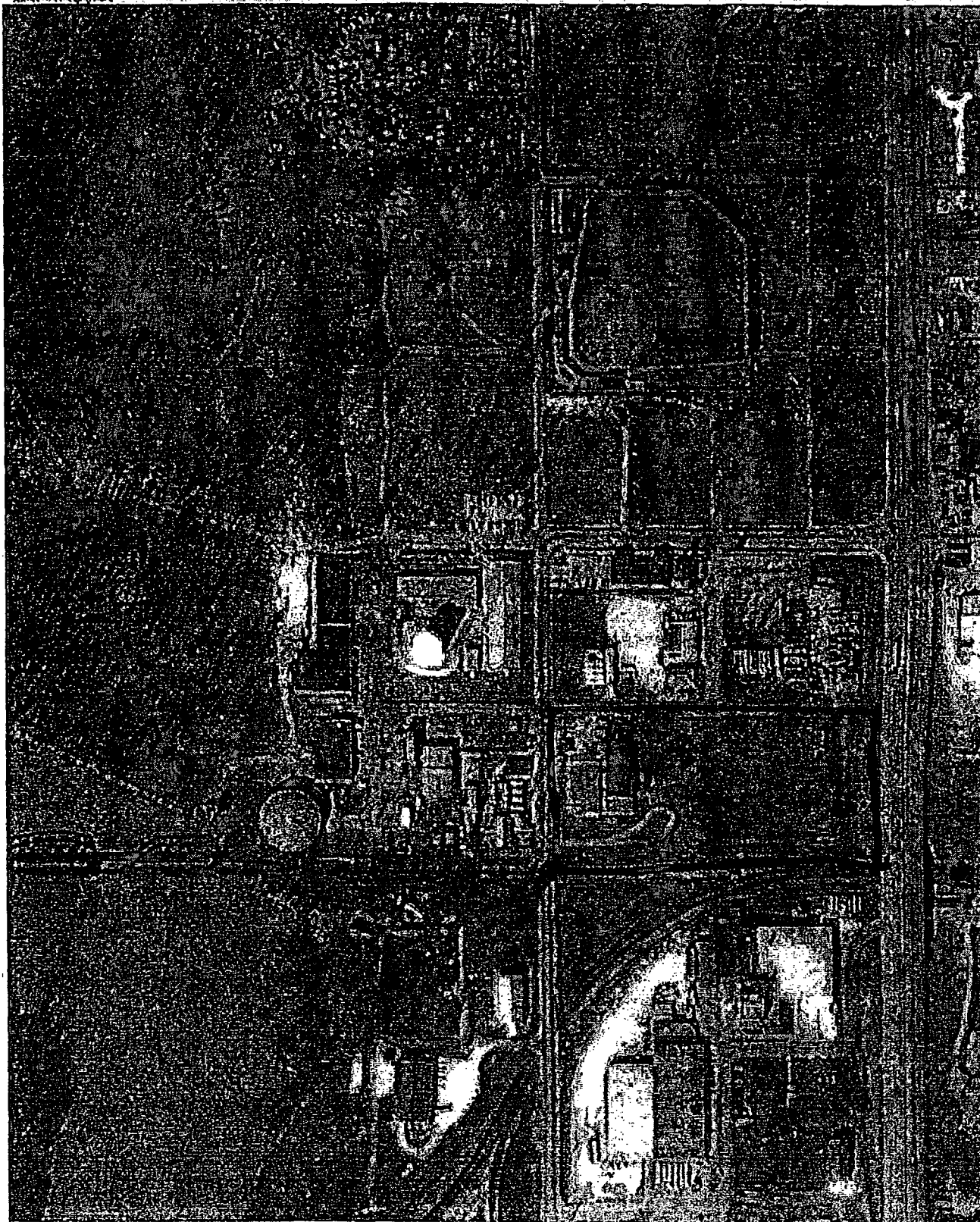
terrestrial

Microsoft TerraServer

Display Image

USGS Aerial Photograph

Terre Haute, Indiana, United States 24 Feb 1998



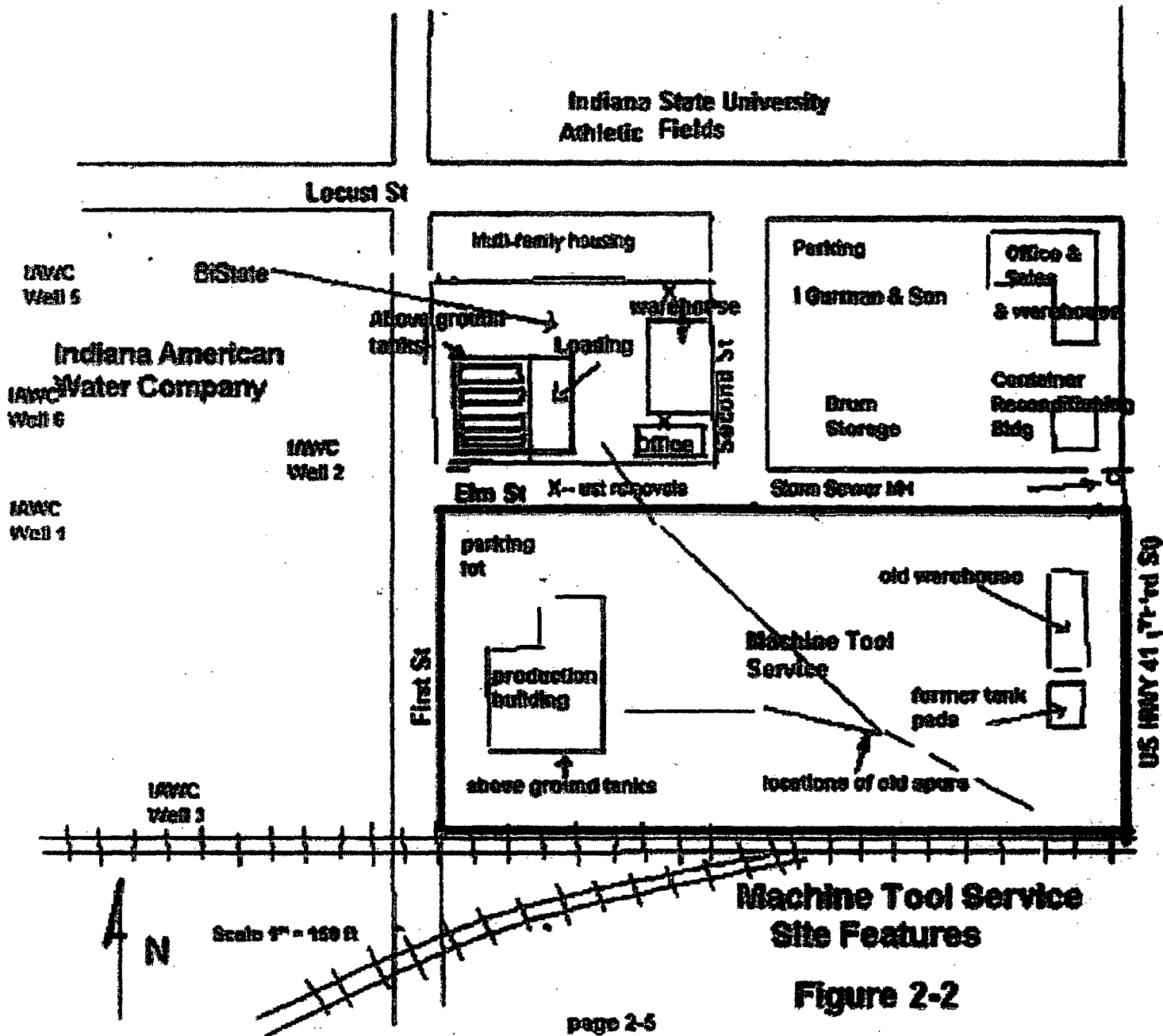


Figure 2-2

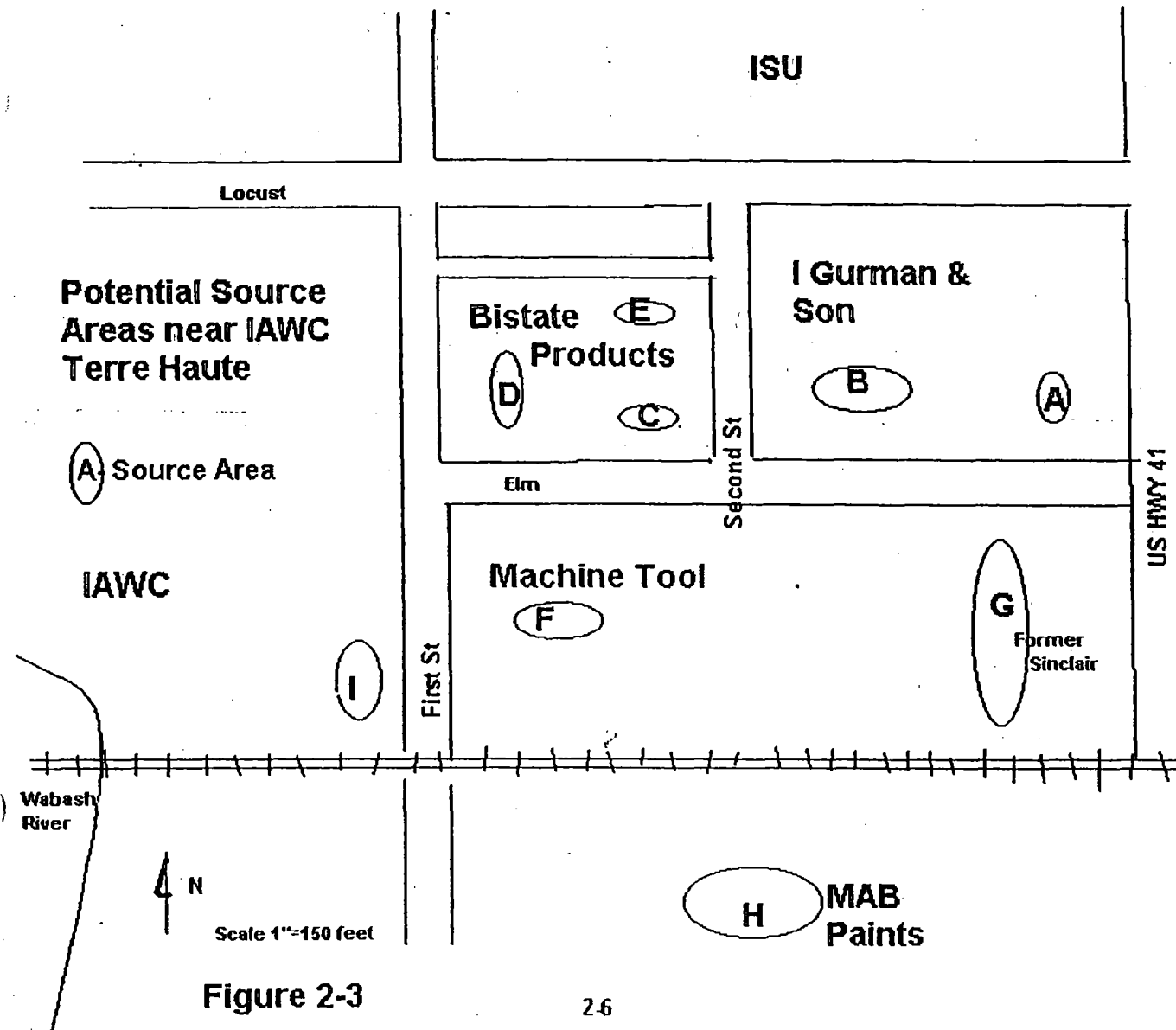


Figure 2-3

Rationale for the location of Monitoring Wells Terre Haute Study Area

Well 1 cluster

Contribution of I Gurman and First Recovery to IAWC wells 1,2,5&6

Well 2 cluster

Contribution of I Gurman and First Recovery to IAWC wells 1,2,5&6

Well 3 cluster

Attribution of I Gurman and First Recovery to IAWC wells 1,2,5&6

Upgradient for Machine Tool

Well 4 cluster

local upgradient of I Gurman, First Recovery, and Machine Tool Service

Well 5 cluster

Attribution of I Gurman and First Recovery to IAWC wells 1,2,5&6

Well 7 cluster

Local upgradient of I Gurman, First Recovery and Machine Tool Service

Well 8 cluster

Local upgradient of I Gurman, First Recovery, and Machine Tool Service

Well 9 cluster

downgradient composite for SW flow and potential downgradient from SE sources (MAB) during high pump volume from past

Well 10 cluster

Local upgradient, Machine Tool Service to IAWC 1,2&3 and possible upgradient of First Recovery and Machine Tool during high pump volume for all IAWC wells

Well 12 cluster

Attribution of source areas on Machine Tool Service and possible contribution of SE sources and comprehensive interpretation of gw flow.

Well 13 cluster

Possible contribution of I Gurman and First Recovery to IAWC well 4 during high pump volume and/or local upgradient

Table 2-1

Table 2-1 continued

Rationale for Boring Locations

Location 1&2

Potential shallow subsurface contamination arising from the old Citgo area on west end of Machine Tool Service

Location 3 & 4

Potential shallow subsurface contamination arising from the dock area of Machine Tool Service

Location 5

Potential shallow subsurface contamination arising from the process area of I Gurman

Location 6

Potential shallow subsurface contamination arising from the drum storage area of I Gurman

Location 7

Potential shallow subsurface contamination arising from the process area of I Gurman

Location 8

Potential shallow subsurface contamination arising from the process area of I Gurman

Location 9

Potential shallow subsurface contamination arising from tank removal at BiState

Location 10

Potential shallow subsurface contamination arising from the storage area of Bistate

Location 11

Potential shallow subsurface contamination arising from the process area of Bistate

Location 12

Potential shallow subsurface contamination arising from the process area of Banks Oil Co.

Section III

PROCEDURES, FIELD OBSERVATIONS AND ANALYTICAL RESULTS

3.1 Introduction

This section outlines the procedures, observations and analytical results of the ESI conducted at MTS.

3.2 Site Representative Interview and Reconnaissance Inspection

On April 24, 1999, Rich Molini, Project Manager and Billy Giles, Geologist, met Hans Eilbracht of MTS and informed him of the location on the property where SIS would like to place our installations. Following the meeting, the above personnel walked the property of the MTS facility for determining the location of soil borings and monitoring wells as specified in the work plan. Other site information had been gathered during the SSI and resubstantiated during this reconnaissance. Specifically soil samples and historical data retrieved during the SSI of MTS, BiState, and I Gurman aided in determining soil boring locations and monitoring well locations. After preliminary locations were chosen with the help of Mr. Eilbracht, existing underground utilities were verified by professional locators. The locations of potential or suspected source areas as noted above is shown on Figures 2-2 & 2-3 and as-built locations of the monitoring wells and soil borings are shown on Figure 3-1 and 3-2. The logic for the chosen locations was enumerated in the work plan and Table 2-1 to coincide with source area assessment. Overhead power lines along First Street necessitated the avoidance of the prime locations, suitable alternatives were found.

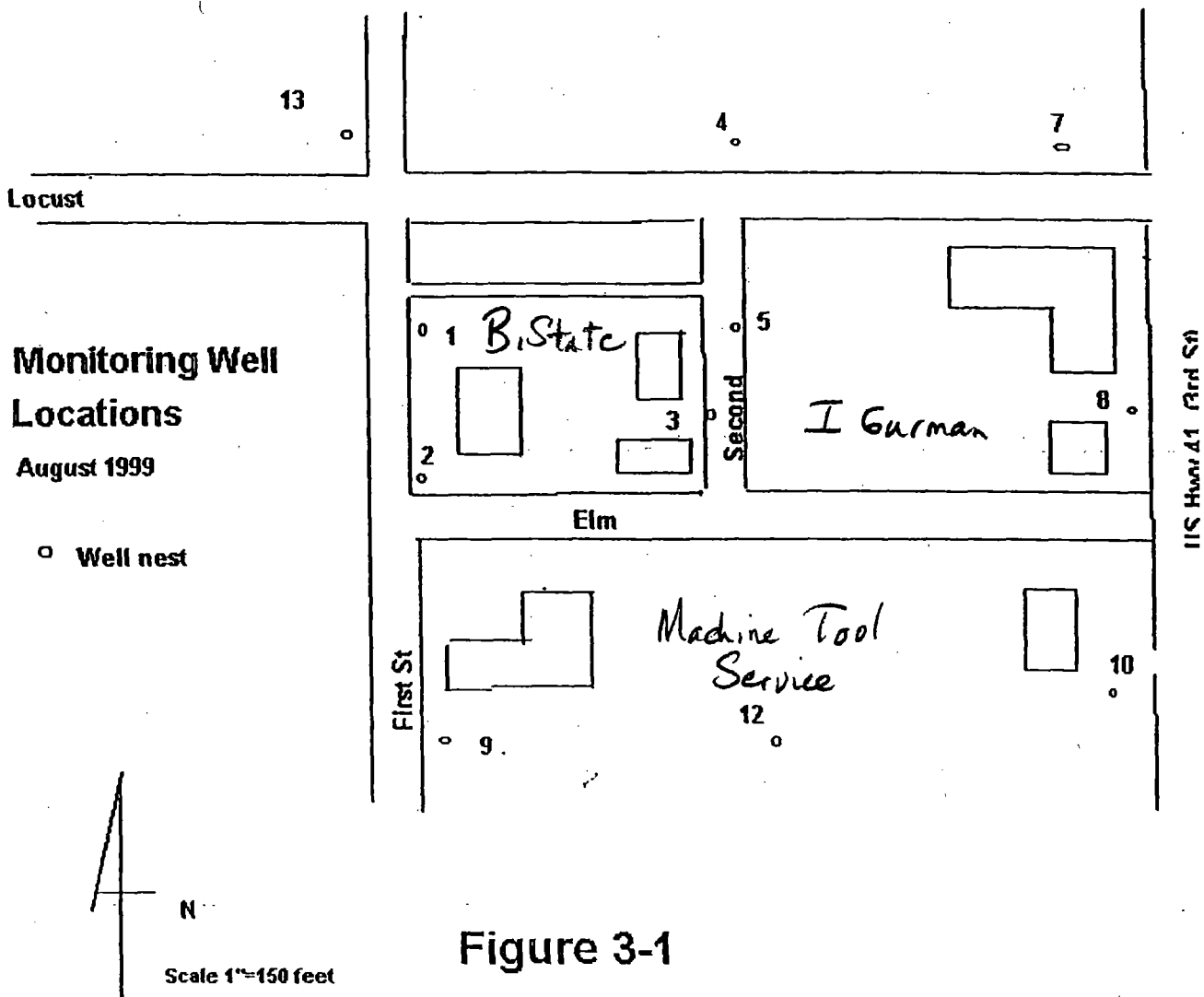


Figure 3-1

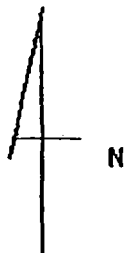
Locust

Soil Boring Locations

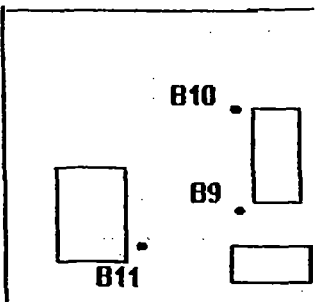
August 1999

- Soil Boring

B12



First St



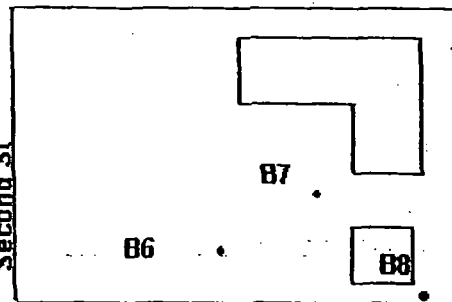
B10

B9

B11

Elm

Second St



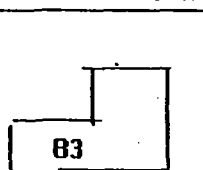
B7

B6

B8

B5

115 Hwy 41 3rd St



B3

B4

B2

B1

Figure 3-2

3.3 Sample procedures and Analytical Results

All the soil and groundwater samples from the wells and the soil borings were collected to aid in determining if VOC contaminants detected in the IAWC well field could be attributable to the suspected source areas F,G or any other areas of the MTS site as shown in Figure 2-2 and 2-3.

3.3.1 Groundwater Wells and Samples

Groundwater monitoring wells were installed at the site utilizing rotasonic technique between July 6 and August 2, 1999. A rotasonic drill rig was chosen to avoid heaving and caving problems associated with thick deposits of sand/sand and gravel. Rotasonic also afforded a great time efficiency in installation and a substantial decrease in drill cuttings which by nature would have to be drummed prior to chemical evaluation. Eleven well nests were completed for the entire project. Each nest consisted of one deep well completed at the bottom of the aquifer and one shallow water table well completed approximately seven feet below the existing water table. All wells were constructed with 2" PVC and 10 foot of PVC .01 slotted screen. A sand pack was installed to 2 feet above the screen, two feet of bentonite pellets were placed on top of the sand pack, and the remainder of the hole was grouted with bentonite slurry by tremie pipe.

All deep wells were completed within the upper most one foot of the shale bedrock which is located approximately 127-137 feet below the ground surface (bgs). The bottom of the screen of the shallow wells ranged from 40 to 54 feet bgs. In addition to the soil sampling, the stratigraphic descriptions from the top of the hole to the bottom of the hole were recorded for each well nest location. The stratigraphy was described and recorded for each deep well location and was

subsequently inferred for the shallow well located approximately 5 feet from each deep well. Three soil samples were collected from each deep hole. Subsurface samples were retrieved at depths of 5 and 15 feet from the ground surface and from the bottom of the hole. The soil samples were collected from the fresh core with a disposable plastic scoop. The samplers wore latex gloves which along with scoops were discarded after each sample collection. The drill stem and drill rods were steam cleaned at the decon pad following the completion of each well. Fresh cores from rotasonic drilling are retrieved from the 10 foot length of drill head in a plastic bag liner. The bag is then slit lengthwise to expose the core. The samples were placed in 4- ounce clear glass jars for VOC analysis. No chemical preservatives were utilized. The samples were immediately placed in a cooler and iced. All the cuttings were drummed and stored within the security fence of Indiana American Water Company property awaiting the analytical results for waste determination. No cuttings were determined to be special or hazardous waste.

The water samples were retrieved after the wells were properly developed. The water samples were collected approximately 4 weeks after the wells were drilled. One water sample (2 - 40 ml vials for VOC analysis) was collected from each shallow and each deep well. The water samples were retrieved with the aid of a mechanical Keck pump . The depth of the water column was determined at each well with a well wizard and subsequently 3 well volumes were extracted prior to the sample collection. The volumes evacuated averaged about 60 gallons for the deep wells and 30 gallons for the shallow wells. The wizard was deconned with DI water during its removal from each well.

The samples were retrieved from the effluent end of the tubing in the 40 ml vials which contained HCL as a preservative. The purge water was used as the pump flush for each location. The

pump and lines were decontaminated with DI water prior to the first hole and upon removal from each subsequent casing prior to the introduction to the next sample site. Table 4-1 displays the construction data for each well location for the entire project with highlighted information defining the MTS site portion of the project data. All soil and water samples were analyzed for volatile organic constituents through the Contract Laboratory Program. Well locations 3, 8, and 10 were considered upgradient wells for the MTS site. (see Table 2-1 page 2-7). Well locations 9 and 12 were considered downgradient of the MTS site source areas. This was initially inferred and later verified by the data shown in Figures 4-1 and 4-2 in the migration pathway discussion.

3.3.2 Soil Borings.

The borings were specifically located (As shown in Figure 3-1 page 3-2) in an attempt to possibly identify surface and/or near subsurface source areas. Borings 3 and 4 were chosen to potentially characterize the area where the above ground tanks of solvent were located, and borings 1 and 2 were chosen to characterize conditions on the east portion of the property where the former petroleum bulk plant was located. Sample were retrieved from depths of 5, 10, and 15 feet below the ground surface at each boring location. Each sample was removed from the fresh cores using a disposable plastic scoop at each depth, placed in one 4 ounce clear glass jars, and immediately iced in the cooler. The samplers wore latex gloves which were disposed of after each sample bottle was filled. The drill rig and drilling equipment were returned to the decon pad and were steam cleaned before proceeding to the next boring location.

3.3.3 Summary of Sampling

A total of 27 soil samples and 8 water samples including trip blanks, duplicates. And field blanks were collected for the MTS ESI. The samples are identified as follows.

Monitoring Well Soils (12)

ECNM8:MW9D22, and ECNM9:MW9D128:

ECNN9:MW10D5, ECNP0:MW10D15, and ECNP1:MW10D133

ECNK3:MW8D5, ECNK4:MW8D15, and ECNK6:MW8D128

ECNM1:MW12D5, ECNM2:MW12D15 and ECNM3:MW12D127

Soil Boring Soil (15)

ECNP2:1B5, ECNP3:1B10, ECNP4:1B15

ECNP5:2B5, ECNP6:2B10, ECNP7:2B15

ECNP8:3B5, ECNP9:3B10, ECNQ0:3B15

ECNQ1:4B5, ECNQ2:4B10, ECNQ3:4B15

ECNR0:6B5, ECNR1:6B10, ECNR2:6B15

Monitoring Well Water(8)

ECNS9:MW8S, ECNT0:MW8D

ECWL5:MW9S, ECWL4:MW9D

ECWM2:MW10S, ECWM3:MW10D

ECNT5:MW12S, ECNT4:MW12D

3.3.4 Analytical Results

The laboratory results from the August 1999 sampling of the MTS site have been determined

to be acceptable for use and meet the criteria contained in the Indiana Quality Assurance Project Plan (QAPP) (refer to Analytical Results in Appendix B). Any exceptions to the acceptance of this data will be identified in the QA/QC memorandum by the CLP chemists. Refer to Appendix C.

3.4 Summary Tables and Charts

As previously mentioned VOC analyses were performed on all samples retrieved during this ESI. The following figures and tables contain the significant findings of the ESI. Refer to Appendix C for a complete list of the chemical analysis data provided by the CLP laboratory program. The results of the August 1999 water sampling are displayed on Figure 3-4. The figure shows the relative position of the wells in relation to the study area. Notice only one deep well showed any contamination, and that being MW8D with PCE identified at 0.6 ppb. Broadly speaking carbon tetrachloride appears to be ubiquitous at or near the water table in the entire study area except for the two southern wells 10 and 9.. The identification of PCE, TCE, 1,1,1-TCA, and CCl₄ are consistent with the compounds identified in the municipal wells.

The monitoring well data does not necessarily indicate a significant degradation of the groundwater as a result of contributions from the MTS site. The primary concerns are expressed in the northern part of the study area from Bistate Products and I Gurman and Son where TCA and TCE are increasing from upgradient to down gradient from monitoring wells 5 to 1 and 5 to 2 and TCE, 1,1,1-TCA are increasing from monitoring well 3 to 2 in the wells screened at the water table. This is concluded as a result of utilizing the data presented in Figures 4-1 and 4-2 on pages 4-4 and 4-5 which displays the general flow of the groundwater to be west southwest. These increases are indeed minor and may not be significant given additional temporal parameters and the possible plume

geometry.

In MW 12S, 2- butanone was detected at 12ppb, but that substance was not identified in the municipal wells. Mw 12S was the only location to show 2-butanone. The soil borings and monitoring well soil samples for the MTS site showed no detectable levels of any targeted compounds as displayed in Figure 3-5 page 3-11 and Figure 3-6, page 3-12.

In order to be more confident of the results from the August 1999 sampling, follow-up sampling utilizing state monies was conducted in October of 2000. The results are shown in Figure 3-7 page 3-15. Again, no results in MW9 and MW12 are especially significant in attributing groundwater contamination to the MTS site. There are however significant detections of 1,1,1TCA in MW 12S and MW 9S that reflect increases from upgradient wells 3,8, and 10. Once again it has not been possible to completely delineate plume geometry nor are all the time related aspects of the migration known.

MW13 S-PCE 1.0 D-0

MW4 D-0 S-CCL4 0.7

MW7 S-CCL4 0.6 D-0

MW1 S-CCL4 6.0, /111TCA 1.0
TCE 2.0/ PCE 5.0

D-0

MW5 S-CCL4 3.0/ 111TCA 0.7
TCE 0.8/ PCE 14.0

D-0

S-PCE 8.0
CCL4 2.0
111TCA 3.0
11DCA 3.0
C1,2DCE 12.0

MW3 D-0

MW8

D-PCE0.6

MW2 S-TCE4.0/ 111TCA3.0
C1,2DCE2.0/ CCL4 2.0
PCE 7.0

D-0

S-PCE 7.0/C1,2DCE 2.0
TCE2.0/ 111TCA 2.0
CCL4 2.0

MW9 D-0
S-0

D-0
MW10 S-0

MW12 S-CCL4 2.0/2-BUT 12.0 D-0

Machine Tool Service Monitoring Well Water Chemical Analysis Results Figure 3-4

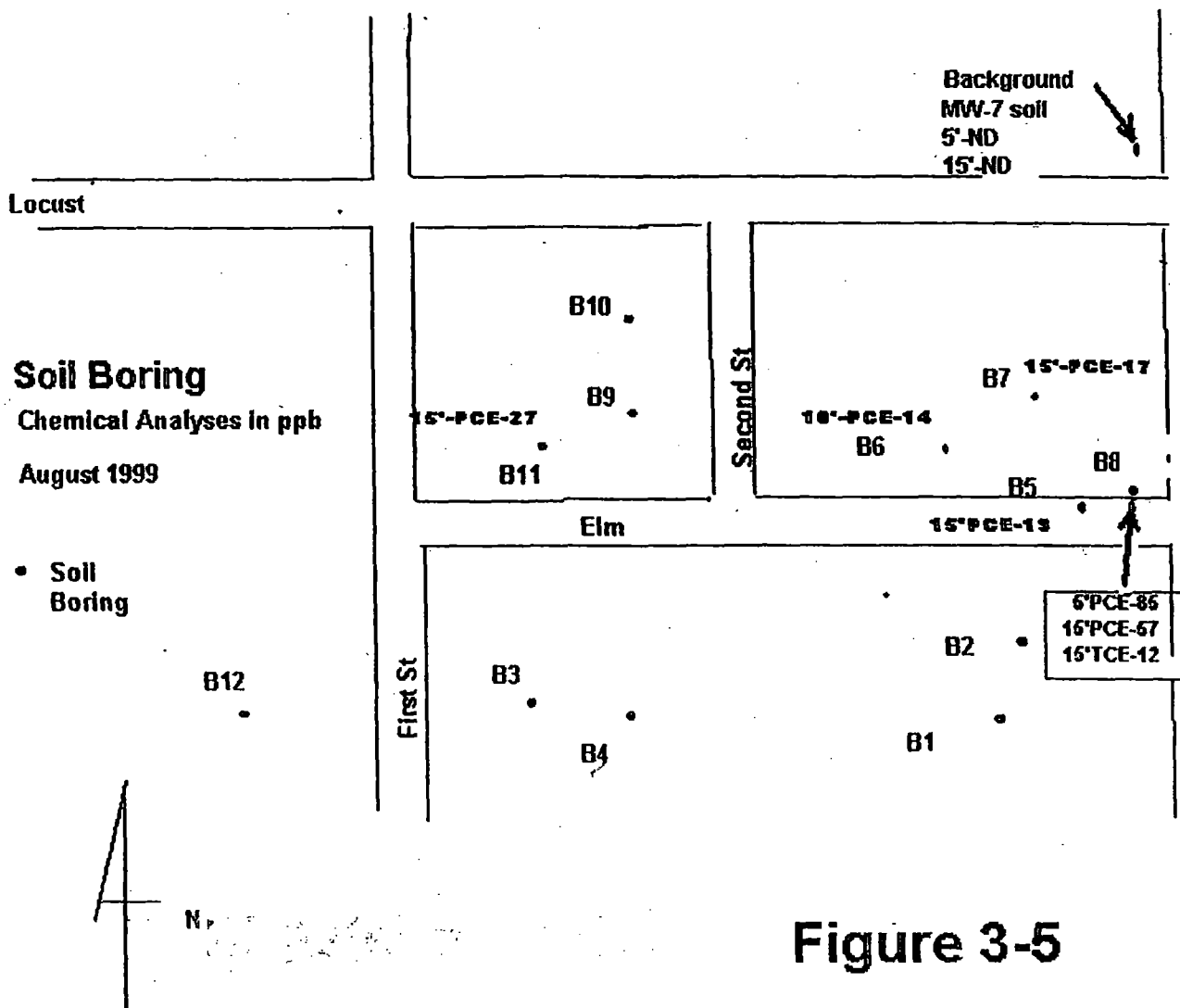


Figure 3-5

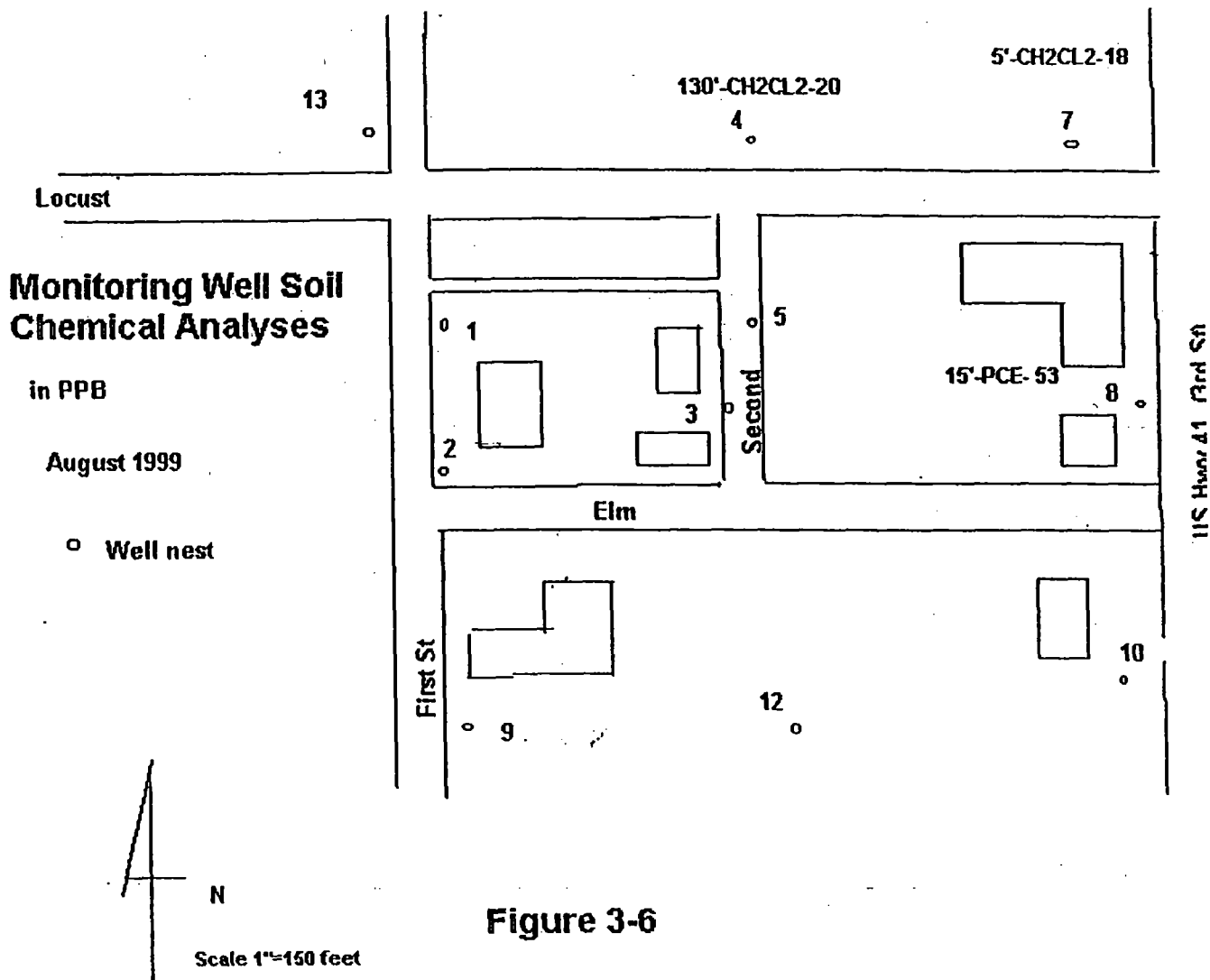


Figure 3-6

Mon well / soil

Key FindingsTable

Machine Tool Service Organics ug/kg
Monitoring Well water

Contaminant	Background MW 8S ECNS9	3X bkgnd	Sample MW 12S ECNT5	Sample MW 9S
2-butanone	0.00	0.00	12.00	
NonCLP				
1,1,TCA	10.00	30.00	600.00	220.00

MW13	S-PCE 0.5 D-0 CCL4 1.6	MW4	D-0 S-Dry	MW7	S-CCL4 1.8 D-0
MW1	S-CCL4 2.3, /111TCA 2.1 TCE 2.5/ PCE 8.7 D-0	MW5	S-CCL4 1.3/ 111TCA 1.6 TCE 2.2/ PCE 5.3 D-0		112TCA2.2 TCE25.0 S- PCE 22.0 CCL4 0.7 111TCA10.0 11DCA 11.0 C1,2DCE 44.0
MW2	S-TCE1.4/ 111TCA2.1 C1,2DCE26.0/ CCL4 0.9 PCE 7.6,11DCA 11.0 D-111TCA0.5	MW3	D-0 S-PCE 7.2/C1,2DCE 11.0 TCE5.9/ 111TCA 4.1 11DCA5.0/ CCL4 0.6	MW8	D-PCE0.9 TCE0.7
MW9	D-111TCA1.0 S-CCI41.4/11DCE0.5 11DCA9.3/111TCA 220				D-0
		MW12	S-CCL43.6/11DCE7.2 11DCA1.2/111TCA 600 D-111TCA 2.8	MW10	S-CCI40.5 111TCA 37

Monitoring Well Water Chemical Analysis Results Figure 3-7
Followup Sampling 10-00

Southwest

Northeast

MW-9

MW-3

MW-5

MW-7

Elevation
aboveMSL

500

fill

dark brown sand

gray
clay

brown sand and gravel

450

brown
sand and
gravel

fine brown sand

brown sand

400

brown sand and gravel

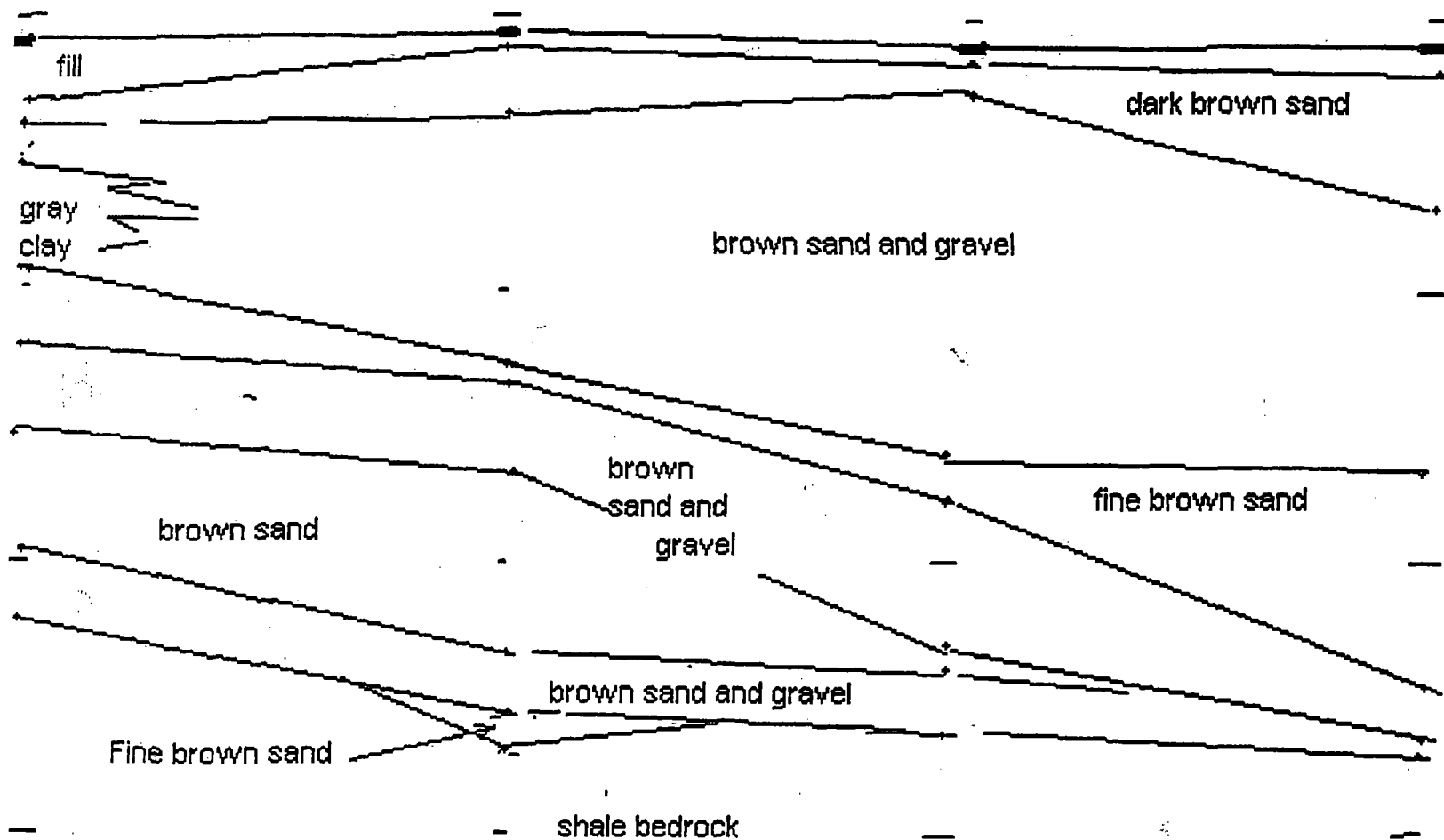
Fine brown sand

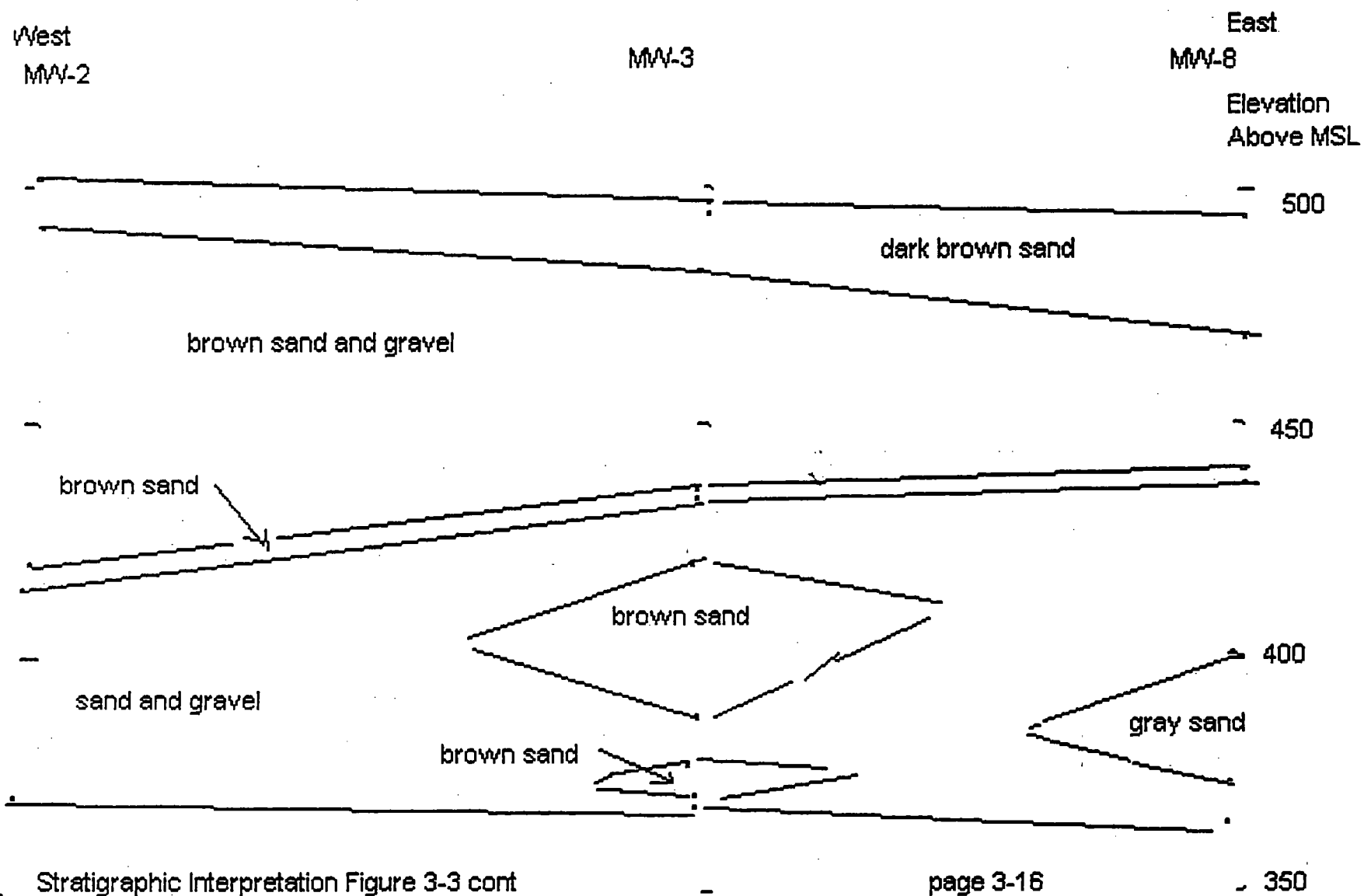
shale bedrock

350

Stratigraphic Interpretation Figure 3-3

page3-15





SECTION IV

DISCUSSION OF MIGRATION PATHWAYS

4.1 Introduction

The primary potential migration pathway for contaminants emanating from MTS site are through groundwater. The surface water, soils, and air pathways are discussed but are not evaluated in this section.

4.2 Groundwater Pathway

A review of literature and the stratigraphic data collected during the ESI confirms the local area as alluvial and outwash sand and gravel deposits of the Wabash Lowland physiographic province. The topography is gently rolling to relatively flat. The MTS site and this portion of the City of Terre Haute are located up near the top of the Wabash River flood plain. The IAWC well field which is located just west of the site is located on the high cut bank of the Wabash River. The thickness of the sand and gravel deposits are about 130 feet at the MTS site. This sand and gravel is underlain by shale bedrock. The great thickness and aerial extent of the

sand and gravel makes this surficial aquifer capable of transmitting large quantities of water. The soils of the area are also very sandy with just slightly more silt than the underlying materials. The soils have rapid permeability and low water holding capacity. Recharge of the aquifer is primarily local from precipitation and because of the local recharge and the lack of any low or moderately impermeable layers above the aquifer it is extremely susceptible to ground surface contaminants.

The primary influences on the rate and direction of this unconfined surficial aquifer flow are the structure of the valley and the flow of the Wabash River. Table 4-1 and Figures 4-1 and 4-2 display limited aquifer data and gradients as measured and recorded on 8-30-99 as part of the ESI. The flow of the groundwater is west southwest toward the Wabash valley. The MTS site appears to currently be side gradient from the IAWC municipal wells. When utilized the capture zone for the IAWC deep wells would certainly include all of the MTS site. MTS likely will not affect the collector well located lower in the Wabash Valley and north of the site. The deep wells are used only intermittently when demand is high since the collector well was installed to avoid the VOC contamination in the well field. The contaminants that have consistently been detected in the municipal deep wells are TCE (wells 1,2,3,4,6) PCE (1,2,4,5,6) 1,1,1-TCA (1 thru 6) and CCl4 (1 thru 6). Figure 3-4 is a spacial and graphical representation of the contaminants detected in the monitoring wells from the study area. From the available data and the speculation enumerated on pages 3-8 and 3-9 MTS could potentially be considered a source of 1,1,1 TCA contamination detected in the municipal well field. .

Monitoring Well Physical Data - near IAWC in Terre Haute

Field Preliminary

] [

Field Verified

Well	Date Installed	bottom screen approx	surface to water	ssamples	TOC	bottom screen actual	*8-30-99 TOC to water	*8-30-99 water table	location
1s	*7-28-99	54			501.77	53.92	49	452.77	5' N of deep
1d	*7-28-99	135		5,15,134	501.77	137.11	49.1	452.67	
2s		54			501.35	53.7	48.59	452.76	5' N of deep
2d	*7-26-99	134	47.2	5,15,133	501.31	133.85	48.87	452.44	18' NE of concrete corner
3s	*7-20-99	48			496.93	47.89	42.6	453.33	5' S of deep
3d	*7-20-99	130	47	5,15,129	497.12	132.99	42.72	453.4	
4s	*7-13-99	47			497.27		42.42	454.85	5' E of deep
4d	*7-12-99	131	40.3	5,15,130	497.12		42.23	454.89	68' ENE of hyd & 12' n of sdwlk
5s	*7-23-99	47			496.33	46.19	41.83	454.5	5' N of deep
5d	*7-22-99	129	40	5,15,128	496.25	128.7	41.72	454.53	
7s	*7-9-99	40			494.8		39.26	455.54	5' E of deep
7d	*7-8-99	128	40.5	5,15,127	494.88	128.1	39.16	455.72	9' N of sdwalk 36.5' NNW of hyd
8s	*7-8-99	42			494.04		38.26	455.66	5' N of deep
8d	*7-7-99	129	40.2	5,15,127	493.92		38.17	455.87	15' E of fence 95' n of bldg
9s	*7-16-99	48			494.97	47.74	42.07	452.9	5' E of deep
9d	*7-16-99	129	40.9	5,15,128	494.93	130.3	42.09	452.84	
10s	*8-2-99				494.8	44.9	39.19	455.61	5' S of deep
10d	*8-2-99	129	40.1	5,15,128	494.66		39.11	455.55	
12s	*7-15-99	46			494.51	40.47	45.09	454.04	5' W of deep
12d	*7-15-99	130	38.7	5,15,127	494.55	128.85	40.46	454.09	50' W of trees 5' N of gravel dr
13s	*7-14-99	53			501.09		48.31	452.78	5' N of deep
13d	*7-14-99	136	46.4	5,15,135	501.03		48.17	452.86	55' WNW of hyd

Table 4-1

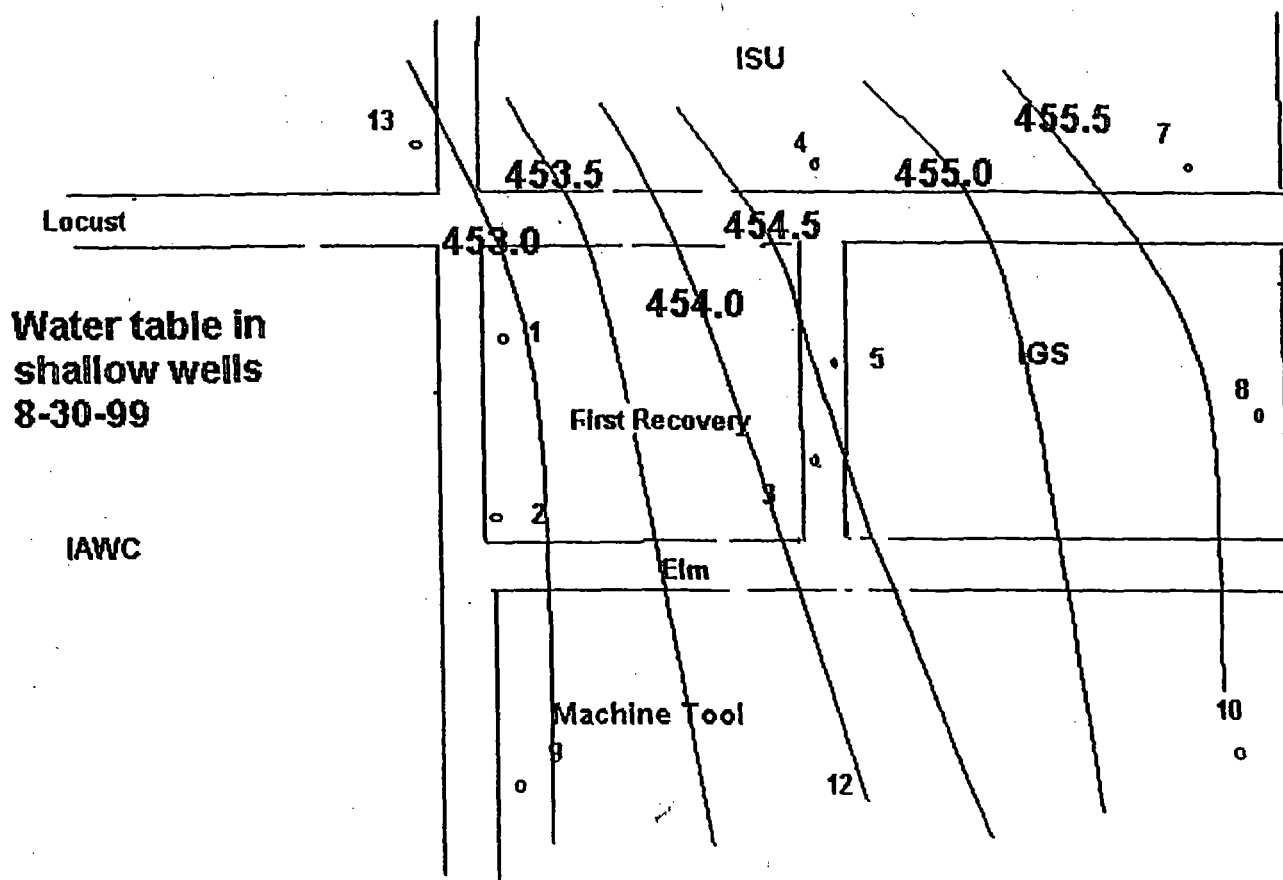


Figure 4-1

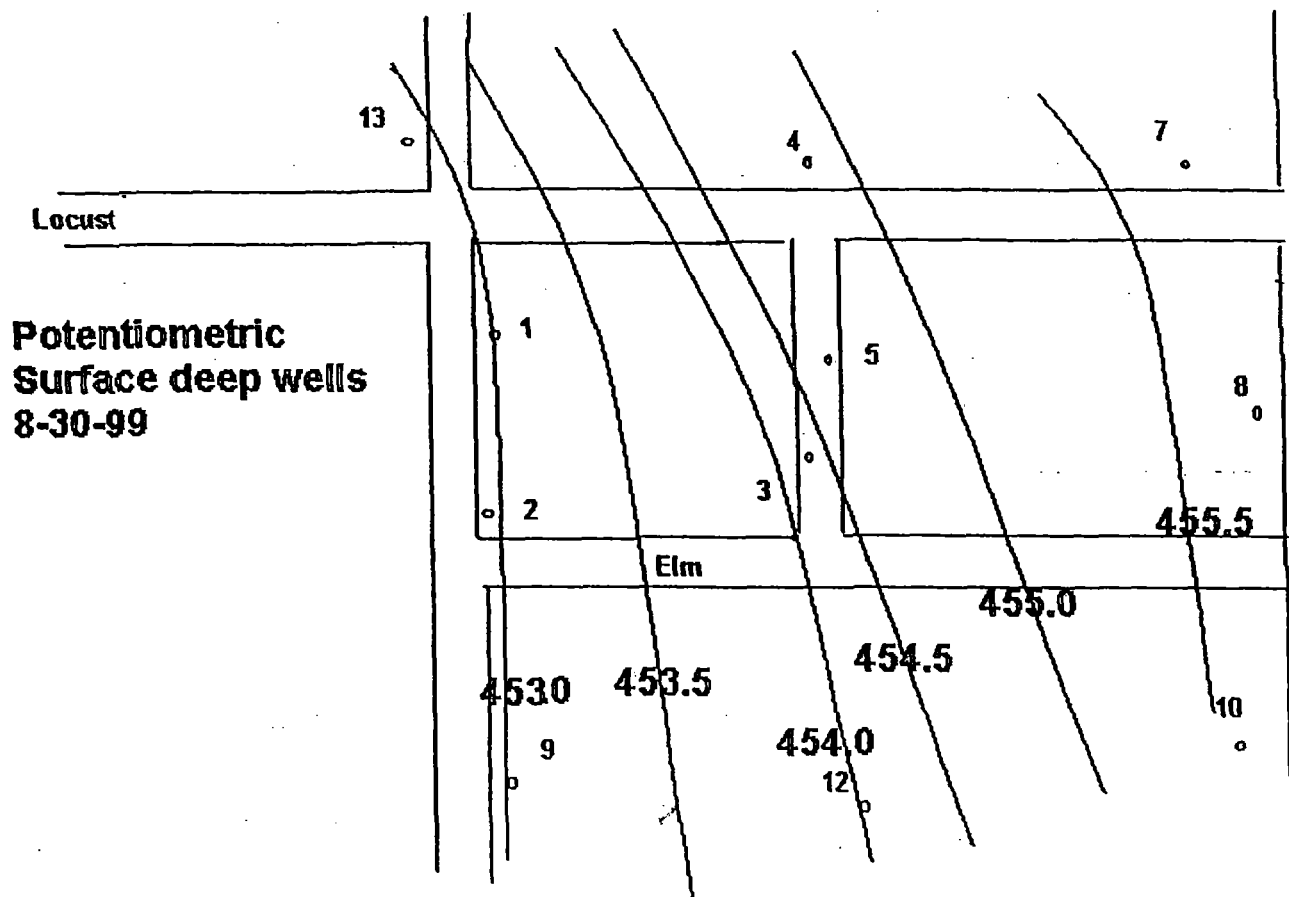


Figure 4-2

4.3 Surface Water Pathway

Surface water runoff on this site is primarily controlled by the flat site topography, rapid infiltration into the sandy surface, and the presence of storm sewers which discharge directly to the Wabash River. No samples were collected to evaluate the surface water pathway since there are no significant water intakes for human consumption nor irrigation within 15 miles from the probable point of entry from the MTS site. Certainly this pathway threat is minor in comparison to the threats posed by that of the groundwater pathway.

The site topography gently funnels surface runoff to the south toward the railroad and then via overland migration route to the Wabash River.

4.3.1 Drinking Water Threat

The majority of residents within the 4-mile radius of the MTS site obtain drinking water from groundwater through the public water supply of the IAWC wells and private residential wells. As stated previously no significant water withdrawal facilities are located on the Wabash River within the 15 mile pathway limit.

4.3.2 Human Food Chain

As noted above no samples were collected to evaluate the human food chain threat through the surface water pathway. Although hazardous materials may have been historically

discharged to the Wabash River via the storm sewer drainage, they are likely currently not of the particular composition nor quantity to pose a significant threat to the human food chain.

4.3.3 Environmental Threat

The Indiana Department of Natural Resources/Division of Nature Preserves-Heritage Program (IDNR/DNP-HP) documents sensitive environments and/or endangered or threatened species within the State of Indiana. A survey conducted by the IDNR/DNP- HP indicated that there are no endangered or threatened species or sensitive environments near or within a 15-mile surface water pathway.

4.4 Soil Exposure

No soil samples were obtained for the evaluation of this pathway during the MTS ESI. There have been no evidence nor reports of incidents of direct contact with any hazardous substances associated with this site. The site is fenced and limited to employee access.

4.5 Air

No air samples were collected to evaluate this pathway. There is no substantive reason to

believe that the evaluation of this pathway is important in determining the environmental significance of the MTS site. Odors were noticeable during the reconnaissance inspection near and around the tank storage area likely due to historical releases of oil products in these areas. There is no evidence nor are there reports of a threat to human health resulting from the migration of hazardous substances through the air. The volatile substances of concern are not particularly closely associated with nor have an affinity for surficial fugitive dust which may originate from the site due to wind erosion and/or soil disturbance.



800 NORTH THIRD STREET
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TERRE HAUTE, IN 47808-1071
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Spill Containment
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Steel/Poly Pails

Steel/Poly Tote Tanks

Drum/Pail
Accessories

Drum Handling
Equipment

Burlap/Poly
Bags

Plastic Bags/Liners

Packaging Supplies

October 27, 2003

Mr. Frank Boenzi
E.P.A.
Mail Code SR-6J
77 W. Jackson Blvd.
Chicago, Illinois 60604

Dear Mr. Boenzi:

I have begun to compile a list of our customers for you on several occasions. On two occasions, I have become physically ill. The other attempts have met with similar results. This being due to the fact that my father has spent almost seventy five (75) years, and I have spent 23 years of my life building a business that is responsible and ethical in every way.

You have stated that your (EPA's) intention is not to put us out of business. However, you do not seem to understand that putting us out of business is exactly what will happen if you have possession of this list.

Every business that has ever sent a drum to Gurman Container for either reconditioning or disposal has done so under the auspices of EPA regulations promulgated in the early 1980's. Now, EPA comes to us and says that it wants to contact those people in regards to paying money to clean up a site that they had nothing to do with the contamination of. As I explained earlier, we feel that the contamination was originated by a faulty sewer that was located on the southeast edge of our property. The contamination that was found, I was told, was minimal, and easily managed. It is my understanding that the one year and 5 years lines of travel will cause the contamination to be self-mitigating anyway.



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Steel/Poly Tote Tanks

Drum/Pail
Accessories

Drum Handling
Equipment

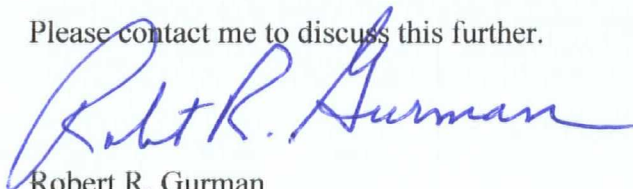
Burlap/Poly
Bags

Plastic Bags/Liners

Packaging Supplies

We have always been honest and forthcoming with any group or agency that has inquired about our activities. We have never had anything to hide. We strive to be good corporate citizens and good employers. Besides my family, we have seven (7) full time employees, with very little turnover. We have not sought legal council due to the obvious expense associated with that and hoping that we may be able to reach some sort of positive agreement that will allow us to maintain our business.

Please contact me to discuss this further.



Robert R. Gurman
President/CEO

**RIPA**

Reusable Industrial Packaging Association



GURMAN CONTAINER & SUPPLY CORPORATION

Established 1922

CONTAINERS FOR INDUSTRY

P. O. Box 1071

Terre Haute, Indiana 47808-1071

**RETURN RECEIPT
REQUESTED**

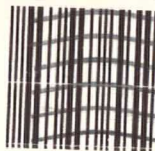
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL



7002 0510 0004 4040 4009

MR. FRANK BOENZI
ENVIRONMENTAL PROTECTION AGENCY
MAIL CODE SR-6J
77 W. JACKSON BLVD.
CHICAGO, IL 60604



9264

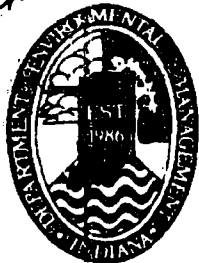
60604

U.S. POSTAGE
PAID
TERRE HAUTE, IN
47807
NOV 03, 03
AMOUNT

\$4.42
00052828-03

60604+3604





INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

John M. Hamilton
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

VIA CERTIFIED MAIL P 125 733 916

April 8, 1998

Mr. Robert Gurman
Gurman Container and Supply Corp.
P.O. Box 1071
Terre Haute, Indiana 47808

Dear Mr. Gurman:

Re: Inspection Results
Hazardous Waste Management
Compliance Evaluation
Gurman Container and Supply Corp.
EPA I.D. No. IND016648230
Terre Haute, Vigo County

Representatives of the Department of Environmental Management (Department) are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. Facilities are being inspected to determine compliance with Indiana Code 13 (IC 13), "Environmental Management Act", and Indiana Administrative Code, 329 IAC 3.1, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements". This article incorporates federal standards for the management of hazardous waste, which have been published in 40 CFR 260 through 40 CFR 270, as of July 1, 1995. These inspections and record reviews are also being conducted pursuant to the requirements of the Resource Conservation and Recovery Act (RCRA), Public Law 94-580, as amended, for authorized state hazardous waste management programs.

This is to inform you that on February 25, 1998, I conducted an inspection of Gurman Container and Supply Corp., located at 800 North Third Street in Terre Haute. You represented your firm. For your information, a summary of the inspection report is provided below:

Type of Inspection: ☒ Complete RCRA Hazardous Waste Inspection
☐ Limited RCRA Hazardous Waste Inspection
☐ Complaint
☐ Other: _____

Results of Inspection: ☐ Additional information is required to evaluate overall compliance.

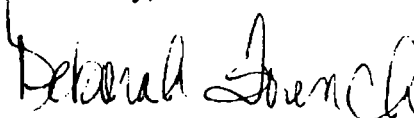
Gurman Container and Supply Corp.
Inspection Results
Page 2

You will receive a completed report within 30 days.

- In compliance, no violations observed.
- In compliance, violations were observed but were corrected during the inspection. See inspection report.
- Violations were observed and require a follow-up inspection. See inspection report. Re-inspection will be conducted after _____.
- ✓ — Violations were observed and require a submittal. See inspection report. Submittal is due 5/11/98.
- Violations were observed and are being referred to our Office of Enforcement. See inspection report.

Please direct any response to this letter and any questions to me at 317-233-5745.

Sincerely,



Deborah French
Environmental Manager
Hazardous Waste Compliance Branch
Solid and Hazardous Waste Management

Enclosure

cc: Vigo County Health Department

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
HAZARDOUS WASTE GENERATOR INSPECTION REPORT**

PURPOSE CEI <input checked="" type="checkbox"/> COI <input type="checkbox"/> EFI <input type="checkbox"/> SPL <input type="checkbox"/> CDI <input type="checkbox"/>	Please Print Facility Name: <u>Gurman Container and Supply Corp.</u> Location: <u>800 North Third Street</u> City: <u>Terre Haute</u> County: <u>Vigo</u> Zip: <u>47808</u> Inspectors Name: <u>Deborah French</u>
Facility wishes to be contacted by OPPTA Yes <input type="checkbox"/> No <input type="checkbox"/>	
SQG <input type="checkbox"/> LQG <input type="checkbox"/> CEG <input type="checkbox"/> NR <input checked="" type="checkbox"/> UI <input type="checkbox"/>	Facility EPA I.D. Number: <u>IND014648230</u>
EFI Required YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Inspector: <u>DJF</u> Time: <u>11:50</u> AM <input checked="" type="checkbox"/> PM <input type="checkbox"/> Date: <u>02/25/98</u>

A. GENERAL INFORMATION

I.	Type and size of Operation, Products, Processes that produce waste (hazardous or non-hazardous). <u>Gurman Container and Supply Corp. is a non-handler of hazardous waste. The bulk of their business involves selling new containers. They also have a drum reconditioning area on-site where approximately 40-50 drums per day are reconditioned. The majority of the drums that are reconditioned are food and used oil drums. A small amount of painting is performed on-site. Attached to this inspection report are empty container forms that Gurman requires their customers to fill out as well as information about the company and its requirements.</u>
II.	Hazardous Waste Streams

EPA #/ Description	Source/Process	Generation Rate	Disposition
<u>No hazardous waste streams are generated pending the results of the waste determination.</u>			

III. Exempted/Excluded Hazardous Waste Streams and Reason for Exemption.

IV. Transporter(s) Used.

V	Non-Hazardous Waste Streams	Source	Rate	Disposition
---	-----------------------------	--------	------	-------------

	Wastewater treatment Sludge	Wastewater treatment	2-3 gallons/mo.	Yard Hill
--	-----------------------------	----------------------	-----------------	-----------

* Pending the results of the waste determination

Document questionable waste streams (non-hazardous).

VI. Non-RCRA violations (open dumping, dumping in city sewer without pretreatment program, OSHA, etc.)

none

VII. Additional Comments

PART 262: Standards Applicable to Generators of Hazardous Waste

#	40 CFR	DESCRIPTION	**NA = Not Applicable. NI = Not Inspected. OK = In Compliance, DF = Deficiency **	NA	NI	OK	DF
---	--------	-------------	---	----	----	----	----

SUBPART

A: GENERAL

1	262.11	Hazardous Waste Determination (characteristic, listed, TCLP, knowledge, exclusions) <i>See violation #1 on list</i>					
2	262.12(a)	EPA Identification Number (Generator must have ID number)				✓	
3	262.12(c)	Generator must not offer waste to transporters or facilities that have not received ID number.	✓				

329 IAC 3.1-7/4-6 & 8

B: THE MANIFEST

4	329IAC 3.1-7-3	General Requirements (manifest to approved TSD/alt. TSD, SQG reclaim exemption on file)(all required info)	✓				
5	329IAC 3.1-7-4	Manifest Acquisition (generator state 1st, consignment state 2nd)	✓				
6	329IAC 3.1-7-5	Number of Copies (generator, transporters, TSD, & 1 copy returned to generator)	✓				
7	329IAC 3.1-7-6	Manifest Use (signature & date: generator, transporter, TSD, keep copy)	✓				
8	329IAC 3.1-7-	Indiana Manifest required for hazardous waste shipped to Indiana TSD Facilities	✓				
9	329IAC 3.1-7-6	Manifest copies available for review, submitted copies within 5 days after shipping	✓				

C: PRE-TRANSPORT REQUIREMENTS

NOTE:		If facility treats in < 90 day tanks or containers, see 268.7					
10	262.30, 31, 32, 33	Packaging, Labeling, Marking, Placarding (DOT regulations) (Only apply if waste is in the process of being transported)		✓			

LARGE QUANTITY GENERATORS

11	262.34(a)	Generator may accumulate on-site for 90 days or less provided that:					
12	262.34(a) (1)	Waste is placed in tanks, containers, containment building, or drip pad	✓				
13	262.34(a) (2)	Container marked with start of accumulation date	✓				
14	262.34(a) (3)	Container/tank marked "Hazardous Waste"	✓				
15	262.34(b)	90 Day accumulation limit	✓				

SATELLITE CONTAINERS

16	262.34(c)(1)	Satellite accumulation (55 gal. maximum or one (1) quart acutely hazardous)	✓				
17	262.34(c)(i)	i) Container must be closed when not in use, in good condition, and compatible with waste	✓				
18	262.34(c)(ii)	ii) marked "Hazardous waste" or other words, at or near process and under control of operator	✓				
19	262.34(c)(2)	If exceed 55 gal., container must be marked with accumulation date and must be removed within 3 days	✓				

SMALL QUANTITY GENERATORS

20	262.34(d)(1)	SQG Requirements - 180 days or less (unless transported over 200 miles), quantity of hazardous waste on-site	✓				
21	262.34(d)(4)	Containers marked with start of accumulation date and words "Hazardous Waste"	✓				
22	262.34(d)(4)	Must also comply with 265 Subpart C and I. See pages 4 and 5.	✓				
23	262.34(d)(5)	i) Emergency coordinator identified	✓				
24	262.34(d)(5)	ii) Following info posted: emergency coordinator, emergency equipment location, phone numbers	✓				
25	262.34(d)(5)	iii) Employees must be familiar with handling and emergency procedures	✓				
26	262.34(d)(5)	iv) Respond to emergencies	✓				

D. RECORD KEEPING & REPORTING			NA	NI	OK
27	262.40	RECORD KEEPING (3 yrs. for copy from manifests, TSD, biennial report, exception report, test results, waste analysis/determination, extension time for unresolved enforcement.) <i>See Violation #1 on DOV</i>			
28	329IAC 3.1-7-14	Biennial Report (due March 1 even numbered years) (LOG ONLY)	✓		
29	262.42	Exception Reporting (LOG: >35 days, if no return copy of manifest, contact TSD: >45 days report to IDEM.	✓		
30	262.43	Additional Reporting, if required by Commissioner (concerning quantities and disposition of wastes in 40 CFR	✓		
31	262.44	SQG Record keeping Requirements (keep records for 3 years: manifests, exceptions, waste determination/analysis)	✓		

E. EXPORTS OF HAZARDOUS WASTE

32	262.52	General Requirements (notify EPA, accepted by receiving country, EPA consent)	✓		
33	262.53	Notification of Intent to Export	✓		
34	262.54	Special Manifest Requirements for Primary Exporters	✓		
35	262.55	Exception Reports (>45 days from US departure, >90 days from receipt by foreign source/waste returned to US)	✓		
36	262.56	Annual Reports (March 1 annually for waste: types, quantity, frequency, destination, waste reduction send to EPA)	✓		
37	262.57	RECORD KEEPING (3 years for intent to export, EPA acknowledgments, confirmation of delivery, and annual reports)	✓		

F. IMPORTS OF HAZARDOUS WASTE

38	262.60	Hazardous Waste Imports (use consignment state's manifest)	✓		
----	--------	--	---	--	--

TSD STANDARDS APPLICABLE TO GENERATORS

265 SUBPART

B. GENERAL FACILITY STANDARDS

(NA for SQG)

39	262.34 / 265.16(a)	Personnel Training (Program Adequacy)	✓		
40	262.34 / 265.16(b)	Personnel received training within six (6) months	✓		
41	262.34 / 265.16(c)	Personnel received annual review	✓		
42	262.34 / 265.16(d)	Training Documents: job titles, job description, type of training, training records	✓		

C. PREPAREDNESS AND PREVENTION

43	262.34 / 265.31	Maintenance & Facility Operation (must be maintained & operated to minimize possibility of release)	✓		
44	262.34 / 265.32	Required Equipment (a. Internal alarm/communication system b. External/telephone communication c. Fire extinguishers and spill control equipment d. water/foam)	✓		
45	262.34 / 265.33	Testing & Maintenance of Equipment	✓		
46	262.34 / 265.34	Communication & Alarm Access	✓		
47	262.34 / 265.35	Required Aisle Space (to allow movement of spill control and emergency equipment and inspections)	✓		
48	262.34 / 265.37	Local Authority Arrangements (police, fire, hospital)	✓		

D. CONTINGENCY PLAN & EMERGENCY PROCEDURES (NA for SQG)

49	262.34 / 265.51	Contingency Plan for Facility	✓		
50	262.34 / 265.52	Contingency Plan Content (SPCC plan, local arrangements, emergency coordinator, equipment list, evacuation plan, etc.)	✓		
51	262.34 / 265.53	Contingency Plan Available (on-site, local distribution)	✓		
52	262.34 / 265.54	Contingency Amendments (when regulations change, if plan fails, when facility makes changes)	✓		
53	262.34 / 265.55	Emergency Coordinator available	✓		
54	262.34 / 265.56	Emergency Procedures followed	✓		

D. CONTINGENCY PLAN & EMERGENCY PROCEDURES (NA for SQG) (CONTINUED)			NA	NI	OK	DF
53	262.34 / 265.55	Emergency Coordinator available	✓			
54	262.34 / 265.56	Emergency Procedures followed	✓			

I. USE & MANAGEMENT OF CONTAINERS

55	262.34 / 265.171	Container Condition (If not in good condition or leaking, must transfer waste or manage in some other way)	✓			
56	262.34 / 265.172	Waste Compatibility with Container	✓			
57	262.34 / 265.173	Container Management (closed/manged to prevent leaks)	✓			
58	262.34 / 265.174	Inspections (weekly)	✓			
59	262.34 / 265.176	Ignitable/Reactive Waste (50 ft. set back)	✓			
60	262.34 / 265.177	Special Requirements for Incompatible Waste (physical separation/container compatibility)	✓			

LAND DISPOSAL RESTRICTIONS

61	268.3	Dilution prohibited as substitute for adequate treatment	✓			
62	268.7	Waste Analysis, Recordkeeping (LDR Notifications: waste code, whether it is a wastewater or non-wastewater, waste constituents to be monitored if monitoring will not include all regulated constituents, subcategory if applicable, and manifest number.)	✓			
63	268.7 (a)(4)	Treatment in 90-day tanks/containers requires waste analysis plan and testing frequency, filed with Regional Administrator (IDEM), certification of shipment, retained copies on-site (5 yrs.), notifications include: EPA ID #, treatment standards with 5 letter code, and manifest number	✓			
64	268.7(a)(7)	Notifications must be kept on-site for five (5) years	✓			
65	268.9	Listed and characteristic waste codes assigned for listed waste exhibiting characteristic	✓			
66	268.42	Alternative treatment specified for lab packs, mixed waste: most stringent standards	✓			
67	268.45	Treatment standards for hazardous debris	✓			

OTHER

68	IC 13-10	Release of contaminants to environment	✓			
69	IAC 3.1-7-8	Facility has waste minimization program as certified on manifest	✓			
70	IC 13-10-2-1(9)	Does facility have any processes or activities (e.g. waste piles, incinerators, land disposal) which require a permit or interim status? If so, please identify below:	✓			

USED OIL MANAGEMENT (GENERATOR ONLY)

If the facility manages used oil only as a generator, complete the following sections. If the facility functions as another type of used oil handler (i.e., transporter, processor, off-spec burner, etc.), complete a separate Used Oil Management Compliance Checklist.

GENERAL INFORMATION

If used oil is stored on-site, indicate how:		n/a
<input type="checkbox"/> containers - indicate type, capacities, and how many on hand		
<input type="checkbox"/> tanks - indicate type, (i.e., above ground/buried; steel, poly, etc.), capacities of each, how many		
<input type="checkbox"/> volume of used oil presently stored on-site		
If used oil is transported on or off-site, indicate:		
<input type="checkbox"/> by whom		
<input type="checkbox"/> type and capacity of transport vehicles		

	329 IAC 13	YES	NO	GENERAL (RULES 3 & 10)	NA	NI	OK	DF
71	3-1(b)			Has used oil been mixed with a listed hazardous waste? (if so, specify how it is managed and disposed)	✓			
72	3-1(b) (1)(B)			Does total halogen content exceed 1,000 ppm?	✓			
73	3-1(b) (1)(B)			If so, can handler rebut presumption of mixture with halogenated hazardous waste? (specify how)	✓			
	329 IAC 13	GENERATORS (RULES 3 & 10)						
74	4-3(c)	Stored in containers or above-ground tanks that are in good condition and are not leaking			✓			
75	4-3(d)	Containers and tanks used to store used oil (including fill pipes for underground tanks) clearly labeled or marked "Used Oil"			✓			
76	4-3(e)	Used oil release response: proper containment, clean-up, reporting, & repair			✓			
77	4-4	On-site burning of used oil restricted to oil generated by owner/operator, heater capacity <500,000 Btu, gases vented to ambient air			✓			
78	4-5	Off-site shipments using EPA-notified transporter (unless <55 gallons)			✓			

UNIVERSAL WASTE MANAGEMENT

A. CATEGORY OF UNIVERSAL WASTE HANDLER									
<input type="checkbox"/> Small Quantity Handler (SQH) (40 CFR 273, Subpart B / 329 IAC 3.1-16) (accumulates < 5,000 kg, or 11,000 lbs, at any time) <input type="checkbox"/> Large Quantity Handler (LQH) (40 CFR 273, Subpart C / 329 IAC 3.1-16) (accumulates 5,000 kg or more at any time) <input type="checkbox"/> Universal Waste Transporter (Trans.) (40 CFR 273, Subpart D / 329 IAC 3.1-16) <input type="checkbox"/> Universal Waste Destination Facility (Dest.) (40 CFR 273, Subpart E / 329 IAC 3.1-16)									
<p>a. Type of Universal Waste handled:</p> <input type="checkbox"/> batteries <input type="checkbox"/> pesticides <input type="checkbox"/> thermostats <input type="checkbox"/> mercury-containing lamps									
<p>b. Amount of Universal Waste:</p> <input type="checkbox"/> generated on-site, monthly _____ <input type="checkbox"/> collected from other sources (specify) , monthly _____ <input type="checkbox"/> total amount presently on-site _____									
B. MANAGEMENT STANDARDS (as applicable to category of Universal Waste handler and type of Universal Waste handled)									
	SQH	LQH	Trans	Dest	(Federal citations, plus 329 IAC 3.1-16)	NA	NI	OK	DF
79	273.12	.32			EPA notification & ID # (LQH only)	✓			
80	273.13	.33	.52		Waste management: containment / residue management (SQH & LQH / transporters - DOT)	✓			
81	273.14	.34			Labeling / marking (SQH & LQH)	✓			
82	273.15	.35	.53		Accumulation time / storage allowance (1 year for SQH & LQH / 10 days for transporter)	✓			
83	273.16	.36			Employee training (SQH & LQH)	✓			
84	273.17	.37	.54		Response to waste releases (SQH, LQH, & Transporter)	✓			
85	273.18	.38	.55	.61	Off-site shipment requirements (SQH, LQH, Transporter, Destination facility)	✓			
86	273.19	.39	.62		Tracking of Universal Waste shipments (LQH & Destination facility // SQH not required // Transporter - DOT)	✓			
87	273.20	.40	.56		Exports (SQH, LQH; Transporter)	✓			
88	273, Subpart E				Destination facilities: applicable RCRA TSDF standards	✓			

Please list guidance materials provided to facility:

The Indiana Hazardous Waste Rules, 329 IAC 3.1, incorporates by reference federal standards which have been published in the Code of Federal Regulations as 40 CFR 260 through 40 CFR 270. Citations reference the federal rules as incorporated, except where the State rule substitute full text language, in which case the specific 329 IAC 3.1 citation will be used.

ATTACH FACILITY MAP

NARRATIVE/DESCRIPTION OF VIOLATIONS

Facility Name: Thurston, Carlene and Sarah Ann

ID #: IND 066-48230

Address: 600 North Third Street Terre Haute, IN

Inspection Date: 2/25/08

[illegible]



GURMAN CONTAINER & SUPPLY CORP. SINCE 1922



800 NORTH THIRD STREET
P.O. BOX 1071
TERRE HAUTE, IN 47808-1071
(812) 232-3413
(800) 448-7626 - US & CANADA
(812) 232-8345 FAX

Empty Intermediate Bulk Container* Certification

I hereby certify that each Intermediate Bulk Container(s) (IBC) being offered is "empty" as that term is defined in the national Environmental Protection Agency's regulations, 40 CFR 261.7** and that it has been properly prepared for transportation under the regulations of the US Department of Transportation, 49 CFR 173.29.***

Signature: _____

Date: _____

* An Intermediate Bulk Container is defined by DOT as a packaging with a volumetric capacity between 450 liters (119 gallons) and 3000 liters (793 gallons).

** With regard to most regulated residues, EPA's 40 CFR 261.7 says: "A container...is empty if:

(i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping and aspirating, and

(ii) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container...or

(B) No more than 0.3 percent by weight of the total capacity of the container remains in the container...if the container is greater than 110 gallons in size."

EPA has explained this rule, saying that one inch or 0.3 percent of waste material is "an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

With regard to residues of products specifically listed by name in 40 CFR 261.33(e) (also called P-listed wastes), EPA says the container is empty only "if the container...has been triple-rinsed using a solvent capable of removing the product, or has been cleaned by another method shown to achieve equivalent removal."

*** DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings, labels and placards must be in place as if the IBC were full of its original contents. In addition, a DOT shipping paper is required for transportation to the reconditioner.



Member, Association of
Container Reconditioners





GURMAN CONTAINER & SUPPLY CORPORATION



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(800) 448-7626 — Ind.
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New & Used
Poly Drums

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Pails

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Plastic Bags

Poly Tanks

DOT/EPA Approved
Hazardous Waste
Containers

Drum/Pail
Accessories

Drum Handling
Equipment

Packaging Supplies

You are undoubtedly aware of the fact that in recent years there have been lengthy and complicated regulations issued by the U.S. Environmental Protection Agency (EPA) and the U.S. Department of Transportation (DOT) and published in the Federal Register. The EPA regulations govern the generation, transportation, treatment and disposition of hazardous waste. The DOT regulations govern the transportation of such material. These regulations went into effect November 19, 1980.

We suggest you put into effect some simple rules which will aid both of our companies in the handling of used steel drums:

1. Both regulations require that the drum be "empty" and we therefore suggest that you implement a procedure to empty your drums as much as possible. This is economically sound because you will be using more of the material you have purchased, and you will at the same time aid in overcoming the impact of the regulations on your company. The EPA has issued the rule that a drum is "empty" if it contains one-inch or less of previous content at the bottom of the drum. Incidentally, one-inch in a 55-gallon drum amounts to approximately 1-2/3 gallons.
2. The empty drum must have all closures firmly in place and secured. This includes bungs, rings, bolts and nuts.
3. If the drum has not been emptied, then the label which describes the contents must remain on the drum, or if it has been made illegible or destroyed, a new one must be affixed to the drum according to DOT regulations.



Member, National Barrel & Drum Association



**PREINSPECTION FILES AUDIT
CHECKLIST**

DATE: / /

BY:

COMPANY: Murman & Sons

LOCATION: 800 N. 3rd St

I.D. # ND-06148-230

Type of Inspection: G---T---TSD---Closure---Complaint---Other (Please Specify)

A. GENERAL

	YES	NO	NI
1. Federal Notification on File	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Federal Part A on File	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Closure Plan Reviewed	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Contingency Plan Reviewed	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Part B Permit Reviewed	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Biennial Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(Note any Special Permit Conditions)

Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

SDG → 1988 F001, F002, F003, F005, K152

Identified in 1988 as not regulated

C. LAND DISPOSAL INFORMATION

I. List Waste and Land Disposal Facility

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT



Good wishes and health go out to our wonderful congregation and community of Terre Haute's United Hebrew Congregation!!!

The Guman Family

top row: Deborah Jean, Whitney Elizabeth, Robert Ray

lower row: Loren Israel, Rachael Nicole

By May 1, 1999, Whitney will be 19, Rachael 16, and Loren will be 11.

Robert R. Gurman
President/CEO

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and
Supply Corp.**

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Fax: (812) 232-8345
(800) 448-7626

**Report of Interview
Bi-State Products
Terre Haute, Indiana**

NON-RESPONSIVE

**Associated with
Chem Group
P.O. Box 3642
Evansville, Indiana 47735-3642
2504 Lynch Road
Evansville, Indiana 47711
Telephone (812) 877-3108
Fax (812) 465-5746
Voice Mail (800) 489-2306 ext. 650**

Date of Interview: 10/23/02

Interviewed by Lance Vlcek and Frank Boenzi, Investigators

This report of interview and its associated investigation including attachments contain information that is confidential and it may be protected by attorney-client or other privileges. Any unauthorized use or duplication is strictly prohibited.

Upon questioning, NON-RESPONSIVE voluntarily provided the following information:

NON-RESPONSIVE

is retired. The Bi-State Products Site is bounded on the east by 2nd Street, by 1st Street to the west, Elm Street to the south, and Locust Street to the north.

NON-RESPONSIVE leased the property (about 11/2 acres) from Machine Tool Service (MTS) located across Elm Street in 1980 and leased it for about 7 or 8 years and operated a business called 1st Recovery. NON-RESPONSIVE started in the oil business about 40 years ago. An outfit out of Evansville owned by Ashland Oil purchased the business from NON-RESPONSIVE and the property from MTS. Hans (a German with a heavy accent) owns MTS. His partner is deceased. I. Gurman cleans drums and in the process accumulated oil and gave it to 1st Recovery for disposal. NON-RESPONSIVE stayed on as the manager. Ashland Oil kept the 1st Recovery name the whole time. Ashland Oil and Valvoline are the same. Valvoline was a division of Ashland Oil. Valvoline owns the property now. Before NON-RESPONSIVE leased the property and operated 1st Recovery, a large oil company owned the property and operated an oil business on the site. Dave Carson owned the business out of Evansville and sold it to Ashland Oil. Ashland Oil purchased 1st Recovery and NON-RESPONSIVE became an Ashland Oil employee along with all of the other 1st Recovery employees. NON-RESPONSIVE has been out of the oil business for about 7 or 8 years.

The white office building was there. There were four 25,000 gallon tanks. Later on a vertical tank was installed next to the four existing 25,000 gallon horizontal tanks. These tanks were used for oil recovery or oil reclaiming. Used oil has a lot of water with it. The water was pumped out of the four horizontal tanks and into the one vertical tank. The vertical tank was installed later on by Ashland Oil when Ashland purchased the business. On the property is a six garage door building used for truck maintenance and storage for drums, etc. [REDACTED] was the dispatcher but the truck drivers knew where to go. The drivers went to Indianapolis also. There was a building next to the tanks used to transfer oil in the tanks to the tanker trucks for transport to the refinery. No drum cleaning took place on the property. The business was to get used oil and then would send it to a refinery in Evansville, Indiana. The used oil would be put in the four tanks for holding or storage. The refinery from Evansville would send their tankers to pick up the used oil.

[REDACTED] stated that when he operated 1st Recovery, he had up to four trucks running and the truck drivers would pick-up spent or used oil from car dealers. On October 23, 2002, [REDACTED] stated that he had records of the business he owned and operated. On October 24, 2002, [REDACTED] said he could not locate any records. [REDACTED] said that information and records could be obtained from Evansville. Dave Carson at (812) 464-4446 is the owner of Evansville and Dave Osbourne at (812) 464-4446 ext. 224 was the Environmental person.

[REDACTED] worked for [REDACTED] as a truck driver and was employed the longest. Wilson's telephone is [REDACTED]. [REDACTED] Vlcek & Boenzi drove in one vehicle while [REDACTED] drove his vehicle to Wilson's residence. Present was [REDACTED].

[REDACTED] said that Valvoline has all the customers on a disk. [REDACTED] picked used oil, sometimes antifreeze and gasoline. Valvoline sold out to Safety Kleen in 1997. Valvoline put all of the customers on a disk. [REDACTED] started working for 1st Recovery and [REDACTED] in 1980 and retired in 1997. [REDACTED] sold to Valvoline in 1990. [REDACTED] was not a Safety Kleen employee. IST Recovery was just used for storage. Oil was picked-up and shipped-out.

A High volume customer was Quick Lube (10 minute oil change operations) where about 500 gallons of oil was picked up every two weeks. There were a lot of these type locations to pick up used oil. [REDACTED] stated that he covered Terre Haute and his territory even included pick-ups from 50 to 100 miles out. Every car dealer in town was a pick-up. [REDACTED] did not pick-up from MAB Paint Company located about a block away from the site.

[REDACTED] stated that he picked-up from Mace Lincoln Mercury. About 500 gallons a month was picked-up from Burger Chrysler Jeep. Alcan, an aluminum plant in Terre Haute, was another big pick-up. The Alcan Aluminum plant was located at 5901 N. 13th Street, telephone (812) 462-2287. Wilson also picked-up fuel oil from the Air Guard around 1995. The Air Guard was located at Terre Haute International Airport, Hulman Field, telephone (812) 877-2524. [REDACTED] further stated that he picked-up from all the strip coal mines namely, Peabody, Amax. Another customer was Wal-Mart's automotive operation. On occasion, picked-up from Sears. The Public Service Company called Cinergy Energy, telephone 1-(800) 521-2232 had truck motor oil and

from their maintenance department in Terre Haute along with the Chauga Power Plant. Cinergy had a contract with 1st Recovery. Vehicle oil and oily water was picked-up. Saw mills in Carbon Indiana were included. Picke Lumber Company had a 500 gallon pick-up about every six months. [REDACTED] said the company (1st Recovery) had three truck drivers and [REDACTED] picked-up the most and was employed the longest.

[REDACTED] said he probably brought in about 20,000 gallons a week. Most likely about 50,000 gallons a week was brought in total. The City of Terre Haute, the Indiana State Highway had a contract with 1st Recovery. Wabash Distributing (a trucking company) had spent oil from their maintenance shops. Quick Lube was the biggest customer with some locations having pick-ups of 1,000 gallons every two weeks. Quick Lube was the number one contributor. Also picked-up from Grease Monkey at 2501 Wabash in Terre Haute. Another customer was Station Break. Picked-up oil from some of the larger farmers and from the farmer co-op. They had a farmer co-op day and all of the farmers would bring their oil in for pick-up. The farmer's co-op ran that.

Another was Reese Oil Company where oil was picked-up from their maintenance shops. Oil was not picked-up from paint companies unless it was from their trucks and maintenance shops. All of the oil change locations, farm implement dealers, car dealers, anyone with trucks, cars, vehicles, County Highway Department, ten minute oil changes were customers. The County Highway Department had about 200-300 gallons a month.

Other truck drivers were [REDACTED]
[REDACTED]
[REDACTED] was the first truck driver in 1980.

The interview was terminated.

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Steel/Poly Tote Tanks

Drum/Pail
Accessories

Drum Handling
Equipment

Burlap/Poly
Bags

Plastic Bags/Liners

Packaging Supplies

November 26, 2003

Mr. Frank Boenzi
E.P.A.
Mail Code SR-6J
77 W. Jackson Blvd.
Chicago, Illinois 60604

Dear Mr. Boenzi:

During our impromptu meeting of Tuesday, November 18th, you stated that EPA, wanted the list of my customers that had placed steel drums with Gurman Container for reconditioning. I have come to the realization that very few of our customers that had sent drums to us were in a chemical business that would have handled the items that are found on the contaminate list.

Since the inception of the RCRA regulations (early 1980's), I can attest to the fact that all drums received have been RCRA empty. However, before the early 1980's, although drums received were empty, we did not require a signed Empty Drum Certification Form from the companies sending them. Companies sending us drums at that time, that I feel may have contained other than food or motor oil associated products were:

Commercial Solvents Corporation, Terre Haute, Indiana
Velsicol Chemical Corporation, Marshall, Illinois
Ulrich Chemical, Evansville, Indiana
Ulrich Chemical, Indianapolis, Indiana
Merchants Distillers Corporation, Terre Haute, Indiana
Lynn Chemical Corporation, Indianapolis, Indiana



RIPA

Reusable Industrial Packaging Association



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Page 2

CONTAINERS FOR INDUSTRY

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Spill Containment
Systems & Supplies

Steel/Poly Pails

Steel/Poly Tote Tanks

Drum/Pail
Accessories

Drum Handling
Equipment

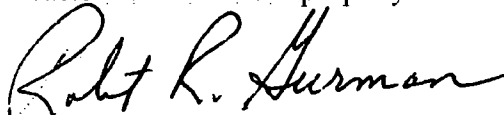
Burlap/Poly
Bags

Plastic Bags/Liners

Packaging Supplies

I am sure that the list is shorter than you expected, but there simply is not a lot of industry in this area. Coupled with the fact that our production capacity was never large, we did not attract the larger customer. Our trucks held 176 drums, maximum, and we only had two or three trucks at any one time. Hence, this has defined our business plan, for the last twenty years, to seek other opportunities in the industrial container field other than reconditioning.

My father states that sometime in the 1970's, The Texaco Oil Company, former owners of the adjacent block of land to the west of this block, hooked up to the sewer that is located in the south eastern corner of our property.



Robert R. Gurman
President/CEO



RIPA

Reusable Industrial Packaging Association



GURMAN CONTAINER & SUPPLY CORPORATION

Established 1922

CONTAINERS FOR INDUSTRY

P. O. Box 1071

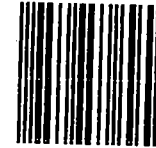
Terre Haute, Indiana 47808-1071



7002 0510 0004 1855 3609



9264



60604

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47807
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\$4.42
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**RETURN RECEIPT
REQUESTED**

MR. FRANK BOENZI
E. P. A.
MAIL CODE ST-6J
77 W. JACKSON BLVD.
CHICAGO, IL 60604

23

28

FedEx USA Airbill

Express

 FedEx
Tracking
Number

825127769360

1 From This portion can be removed for Recipient's records.

 Date 7/21/03 FedEx Tracking Number 825127769360

 Sender's Name Robert Gurman Phone 812 232-3413

 Company GURMAN CONTAINER & SUPPLY CORP

 Address 800 N 3RD ST Dept./Floor/Suite/Room

 City TERRE HAUTE State IN ZIP 47807
2 Your Internal Billing Reference
3 To
 Recipient's Name Fouad Dababneh Phone

 Company U.S. EPA

 Address Region 5 (SR-6J) 77 West Jackson Blvd
 To "HOLD" at FedEx location, print FedEx address. We cannot deliver to P.O. boxes or P.O. ZIP codes.

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8251 2776 9360

0157801606

SNA12

Form
I.D. No.

0215

Recipient's Copy

4a Express Package Service

 Packages up to 150 lbs.
 Delivery commitment may be later in some areas.

☒ FedEx Priority Overnight
 Next business morning
☐ FedEx Standard Overnight
 Next business afternoon
☐ FedEx First Overnight
 Earliest next business morning
 delivery to select locations
☐ FedEx 2Day*
 Second business day
☐ FedEx Express Saver*
 Third business day
 *FedEx Envelope/Letter Rate not available
 Minimum charge: One-pound rate

4b Express Freight Service

 Packages over 150 lbs.
 Delivery commitment may be later in some areas.

☐ FedEx 1Day Freight*
 Next business day
☐ FedEx 2Day Freight
 Second business day
☐ FedEx 3Day Freight
 Third business day

* Call for Confirmation:

* Declared value limit \$500

5 Packaging
☒ FedEx Envelope/Letter*
☐ FedEx Pak*
☐ Other Pkg.
 Includes FedEx Box, FedEx
 Tube, and customer pkg.

6 Special Handling

Include FedEx address in Section 3.

☐ SATURDAY Delivery
 Available only for FedEx Priority
 Overnight and FedEx 2Day
 to select ZIP codes
☐ SUNDAY Delivery
 Available only for FedEx Priority
 Overnight to select ZIP codes
☐ HOLD Weekday
 at FedEx Location
 Not available with
 FedEx First Overnight
☐ HOLD Saturday
 at FedEx Location
 Available only for FedEx Priority
 Overnight and FedEx 2Day
 to select locations

Does this shipment contain dangerous goods?

One box must be checked.

☒ No
☐ Yes
 As per attached
 Shipper's Declaration
☐ Yes
 Shipper's Declaration
 not required
☐ Dry Ice
 Dry Ice, 9, UN 1845 _____ x _____ kg
☐ Cargo Aircraft Only
 Dangerous Goods cannot be shipped in FedEx packaging.

7 Payment

Bill to:

Enter FedEx Acct. No. or Credit Card No. below.

☐ Obtain Recip.
 Acct. No.

☒ Sender
 Acct. No. in Section
 1 will be billed.
☐ Recipient
☐ Third Party
☐ Credit Card
☐ Cash/Check

Total Packages

Total Weight

Total Charges

Credit Card Auth.

†Our liability is limited to \$100 unless you declare a higher value. See the FedEx Service Guide for details.

8 Release Signature Sign to authorize delivery without obtaining signature.

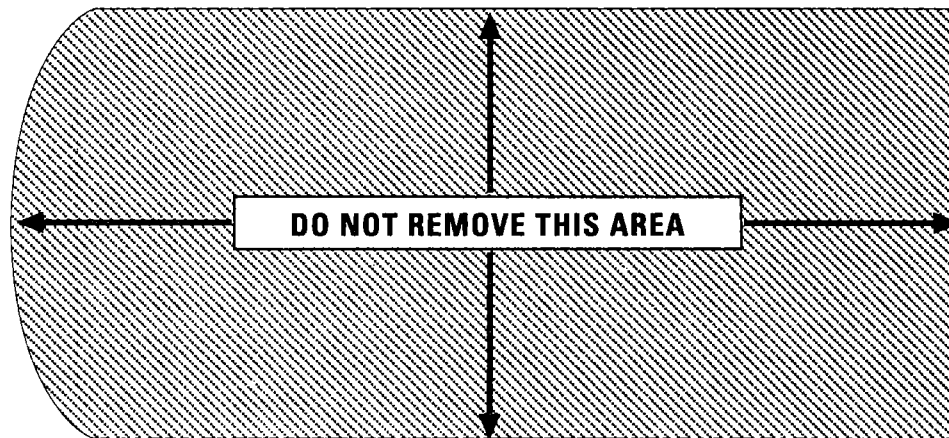
 By signing you authorize us to deliver this shipment without obtaining a signature
 and agree to indemnify and hold us harmless from any resulting claims.

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Peel and Stick FedEx USA Airbill

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2. Retain "Sender's Copy" for your records.
3. Remove label backing.
4. Adhere Airbill to front of package.
Please DO NOT remove "FedEx Copy."



PEEL FROM THIS CORNER.

JUN 19 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert R. Gurman, President/CEO
I. Gurman and Sons, Inc. a/k/a Gurman Container
and Supply Corp.
800 North Third Street
Terre Haute, Indiana 47807

→ Delete Spaul

Re: Request for Information Pursuant to Section 104(e) of CERCLA
for I. Gurman and Sons, Inc. a/k/a Gurman Container and
Supply Corp. Site in Terre Haute, Indiana

→ Delete Spaul

Dear Mr. Gurman:

The U.S. Environmental Protection Agency (U.S. EPA) is investigating the I. Gurman and Sons, Inc. a/k/a Gurman Container and Supply Corp. Site ("Site") at 800 North Third Street, Vigo County, Terre Haute, Indiana. The U.S. EPA believes that you may have information that is relevant to the investigation of contamination at the Site. Enclosure 1 is a summary of the history of this Site and the results of U.S. EPA's investigation.

→ Delete no Spaul

The U.S. EPA asks that you provide information and documents relating to the contamination of the Site. Please respond completely and truthfully to this Information Request and its questions in Enclosure 2 within thirty days of your receipt of this letter. Instructions for completion of this response are in Enclosure 3; definitions of terms used in this Information Request and its questions are in Enclosure 4.

You may consider some information that we request as confidential. If you wish to assert a privilege of business confidentiality, you must respond to the question and advise U.S. EPA that you request that the Agency treat the response as confidential business information. Directions to assert a claim of business confidentiality are in Enclosure 5.

The Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §§ 9601, et seq., commonly referred to as CERCLA or Superfund gives the U.S. EPA the authority to:

- 1) assess contaminated sites, 2) determine the threats to human health and the environment posed by a site, and 3) clean up those sites.

Under § 104(e)(2) of CERCLA, U.S. EPA has authority to gather information and to require persons to furnish information or documents relating to:

A. The identification, nature, and quantity of materials which have been or are generated, treated, stored or disposed of at a vessel or facility or transported to a vessel or facility;

B. The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at/or from a vessel or facility;

C. The ability to pay the costs of the clean up.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to each question within this Information Request and within the prescribed time frame can result in an enforcement action by U.S. EPA pursuant to Section 104(e)(5) of CERCLA, as amended. Failure to respond and failure to justify the non-response can result in similar penalties under this Section. Further, Section 104(e)(5) authorizes the United States to seek penalties from a federal court of up to \$27,500 for each day of continued non-compliance. The U.S. EPA considers non-compliance to be not only failure to respond to the Information Request, but also failure to respond completely and truthfully to each question in the Information Request.

The provision of false, fictitious or fraudulent statements or misrepresentations may subject you or your firm to criminal penalties of up to \$10,000 or up to five 5 years imprisonment, or both, under 18 U.S.C. § 1001.

The U.S. EPA has the authority to use the information requested in an administrative, civil, or criminal action.

This information request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501 et seq.

Return your response to U.S. EPA within 30 days of your receipt of this Information Request. Mail your response to:

Fouad Dababneh
U.S. Environmental Protection Agency
Region 5 (SR-6J)
77 West Jackson Blvd
Chicago, IL 60604-3590

If you have questions about a legal matter please call our attorney, Jose Deleon at (312) 353-7456. Address all other

questions to Fouad Dababneh at (312) 353-3944.

We appreciate your effort to respond fully and promptly to this information request.

Sincerely,

Thomas C. Marks, Chief
Remedial Enforcement Support Section

Enclosure: 1. Site History
2. Questions
3. Instructions
4. Definitions
5. Confidential Business Information

cc: Rich Molini, IDEM
Dawn Groves, IDEM

CONCURRENCE REQUESTED									
TECHNICAL SUPPORT SECTION, SPMB, OSF									
<i>7/15/03</i>	<i>fa</i>				<i>[Signature]</i>	<i>6/13/03</i>			
AUTHOR	PIST	PRE-REM	TECH. SUPP		ORC	SEC. CH.	BR. CH.	ADD	WMD

DISK INFORMATION:

bcc: Jose Deleon, C-14J

800 NORTH THIRD STREET
P. O. BOX 1071
TERRE HAUTE, IN 47808-1071
(812) 232-3413
(800) 448-7626
(812) 232-8345 FAX
gurman.container@verizon.net
www.gurmancontainer-supply.com

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Steel/Poly Tote Tanks

Drum/Pail
Accessories

Drum Handling
Equipment

Burlap/Poly
Bags

Plastic Bags/Liners

Packaging Supplies

July 16, 2003

Fouad Dababneh
U.S. EPA
Region 5 (SR-6J)
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Dear Mr. Dababneh:

I am writing this letter to correct a date in the "Site History" section.

To correct the record, in the second paragraph of the "Site History" you state that my company was involved in the sale and reconditioning of steel barrels since 1930. In fact, the reconditioning plant was built in 1948. That is the correct date that we started to recondition drums.

In addition, if there is any further information that you require, please contact me.

Sincerely,



Robert R. Gurman,
President/CEO

**RIPA****Reusable Industrial Packaging Association**



GURMAN CONTAINER & SUPPLY CORP.
RESPONSE TO EPA INFORMATION REQUEST 7-16-03

1. Yes.

a. Sodium hydroxide, beads or flakes. Tri-sodium phosphate, dry in bags. Paints/solvents, liquid.

b. Sodium hydroxide and tri-sodium phosphate – Ulrich Chemical and Mid-States Chemical-Indianapolis, IN, Paints/Solvents - Wabash Products Company, Terre Haute, IN.

c. All items were used in the steel drum reconditioning process at about 10% strength. Sodium hydroxide is purchased in 400# drums, tri-sodium phosphate is purchased in 50# bags, paint and solvents purchased in 5-gallon pails. Black paint usually purchased in a 55-gallon drum. Solvent purchased in quantities of 15 gallon at a time. The sodium hydroxide and the tri-sodium phosphate are stored in a clean dry area in our warehouse. The paints and solvents are stored in a fire proof, diked room attached to an out building.

d. All items used when steel drum reconditioning in progress.

e. Reconditioning building.

f. See "c" above.

2. January 1, 1992 to Present.

a. Robert Gurman- President/CEO. Owner, oversees entire operation, all facets

John Fowler, General Foreman/CDL Truck driver. Supervises production, warehouse, yard, and makes deliveries.

3a. Metzger Family prior to 1947

Israel Gurman 7-3-47 to 7-29-54

Isadore and Charles Gurman 7-29-54 to 1-1982

Isadore Gurman 7-29-54 to 1-1-92

Robert Gurman 1-1-92 to Present

b. Ownership

c. Unknown

4. See # 3

5. See Attachments

6. Not applicable.

7. See # 3

8. Yes, See # 1 c

9. No

10. See # 1 c

11. Region 5 EPA, this issue.

2-25-98 IDEM Complete Haz Waste Inspection.

City of Terre Haute Waste Water Treatment Plant. -- Periodic Inspections

12. Early 1983- Citation involving waste water limitations. Full compliance achieved shortly thereafter.

2-25-98 IDEM Haz-Waste Inspection. Paperwork deficiency. Lab results not available at time of inspection. Supplied to the IDEM shortly thereafter.

13. Yes.

14. No.

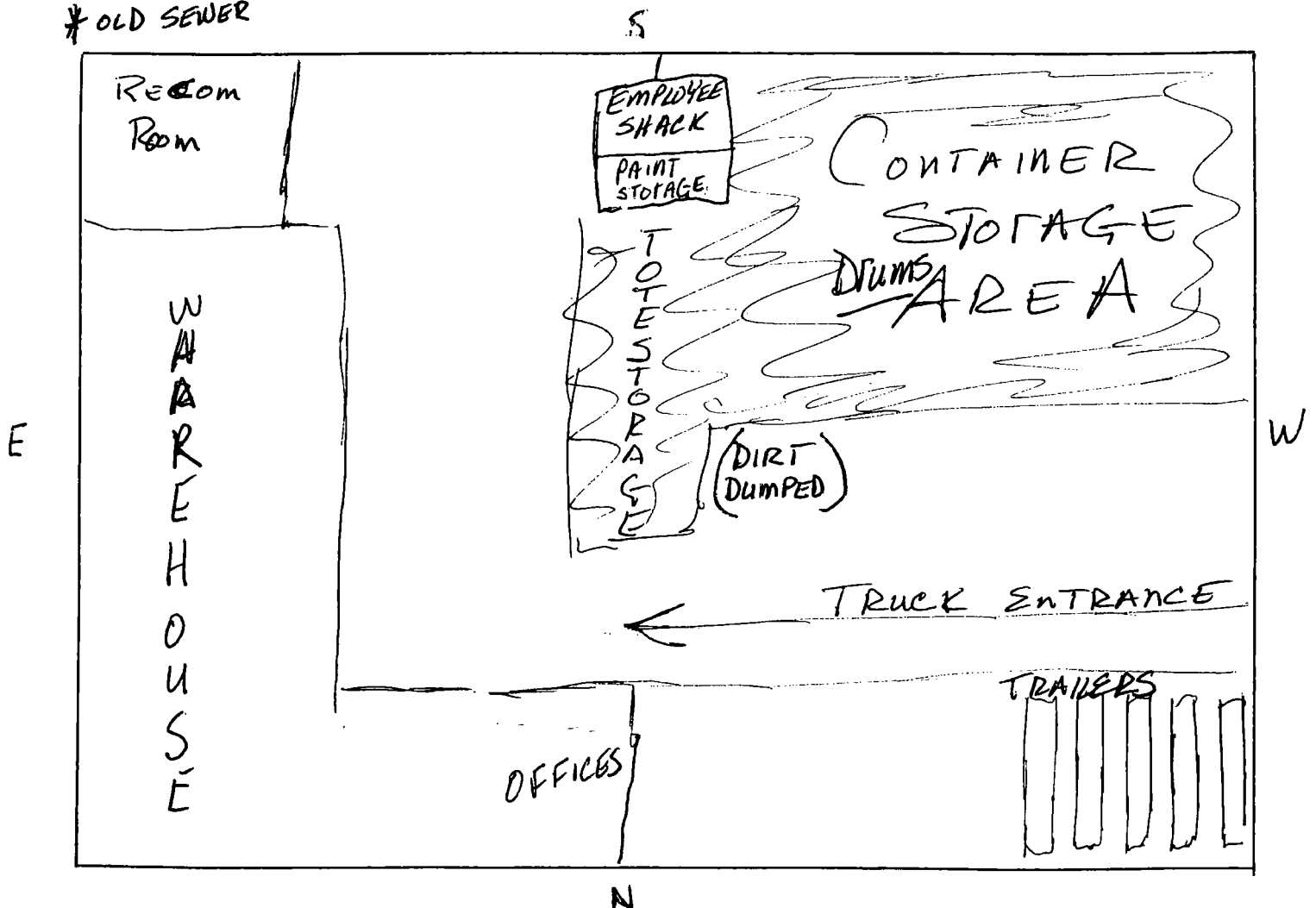
15. All information of this type, that we possess, is being submitted with this questionnaire.

16. None to my knowledge

17. Container storage area.

a.

* OLD SEWER



17 b. Container storage area. Approx. 100' x 100'

c. 1960 to Present

d. container storage area

e. none

f. N/A

g. N/A

18. None to my knowledge.

19. Suspected contaminated soil has been excavated but not removed from the site. The soil was wet and soft in the location of our latest building site. In order to provide a solid footing for the new warehouse, the soil was replaced with dry dirt. I felt the soil to be suspect due to the location of a an old city sewer located on the northwest corner of Third and Elm streets that we used for many years, and the location of our chaining equipment that had been used in the 1970's up to 1980.

a. I believe the excavation pit was about 6' x 9' x 7'. As I remember, the amount of dirt taken from this site was two (2) dump truck loads.

b. Referring to the hand drawn map. The excavation was just north of the reconditioning room, where the last (#6) warehouse now sits.

c. The soil was piled in our back lot where is was dried out and then used to fill in gaping holes in our truck lot.

d. Approx. 06-2001

e. Dennis McGuire, McGuire Excavation, Terre Haute, In, 812-466-3434

f. In erection of new warehouse, it was learned that soil base was too soft.

g. Unknown

h. No tests were done because soil was not removed from the site.

i. Robert Gurman, Dennis McGuire.

20. No Issues.

21. None

22. None

23. N/A

INFO REQUEST
#2

PROMISSORY NOTE

\$51,335.00

Terre Haute, Indiana
January 1, 1992

FOR VALUE RECEIVED, the undersigned I. GURMAN & SONS, INC., an Indiana corporation, and ROBERT R. GURMAN--herein collectively called the "Makers" or individually a "Maker"--promise jointly and severally to pay ISADORE GURMAN and ANNE W. GURMAN, or order, the principal sum of fifty one thousand three hundred thirty five and 00/100 dollars (\$51,335.00), together with interest (computed on a 360-day year and 30-day month) from the date of this Note on the unpaid principal balance, until paid, at the rate of nine per cent (9%) per annum. Principal and interest shall be payable at 316 Potomac Avenue, Terre Haute, Indiana or such other place as the holder of this Note may from time to time designate by notice to Makers or either Maker, in one hundred eighty (180) consecutive monthly installments of principal and interest combined of five hundred twenty and 67/100 dollars (\$520.67) per installment payable on the first day of each month beginning February 1, 1992. Each installment payment shall be applied first on the interest then accrued, then the balance on the principal.

Makers reserve the right at any time and from time to time after June 1, 1992, to prepay the principal amount of this Note in whole or in part without premium or penalty, subject to the provisions hereinafter in this paragraph set forth. Any partial prepayment must be made on the first day of a calendar month and be in the amount of

five hundred twenty and 67/100 dollars (\$520.67) or any multiple thereof. Any partial prepayment shall be applied against the principal amount outstanding and shall not postpone the due date of any subsequent monthly installments or change the amount of such installments. (However, in the event of one or more partial prepayments, the final installment payable hereunder shall in no event exceed, when made, the then remaining unpaid principal together with interest accrued thereon as aforesaid).

Makers shall pay to the holder of this Note a late charge of two per cent (2%) of any monthly installment not received by the holder within fifteen (15) days after the installment is due.

Makers and all other persons at any time liable for payment of the indebtedness hereunder, whether primarily or secondarily, for themselves, their heirs, executors, administrators, successors and other assigns, expressly waive all applicable exemption rights, whether under the state constitution, homestead laws, or otherwise, and also expressly waive valuation and appraisement, presentment, protest, demand, notice of protest, non-payment and consent to and waive notice of the granting of indulgences or extensions of time of payment, the taking or releasing of security, the addition or release of persons primarily or secondarily liable on or with respect to this Note, all in such manner and at such time or times as the holder hereof may deem advisable. The holder hereof may at any time by written instrument waive any event of default which shall have occurred on the part of Makers. No such written waiver shall extend

to any subsequent or other default. No delay or failure by the holder hereof to exercise any right, power or remedy hereunder shall impair any such right, power or remedy or be construed as a waiver of any default by the Makers or any acquiescence therein.

"Event of default" means in this Note any of the following events, namely:

- (a) The refusal or failure of Makers to pay any installment of principal and/or interest when due under this Note;
- (b) The death of Robert R. Gurman;
- (c) The sale and conveyance, exchange, gratuitous transfer (whether or not in trust), or other disposition, by Robert R. Gurman--or his contracting to sell (whether on a deferred basis or not) or his contracting to otherwise dispose--of the following real estate in Vigo County, Indiana, namely, Lots 1, 2, 3, 4 (except that part thereof conveyed to City of Terre Haute, as shown by instrument dated February 24, 1984, and recorded in Deed Record 396 page 43, records of Recorder's Office of Vigo County, Indiana), 5, 6, 7, and 8 in Block 6 in Linton's Addition to the City of Terre Haute, Indiana; or
- (d) The filing of a petition in bankruptcy or insolvency or for reorganization or for the appointment of a receiver or trustee of all or part of the property of Makers or either of them and the pendency of such proceedings for more than thirty (30) days, or the filing of any such petition by Makers or either of them, or the making of an assignment for the benefit of creditors by makers or either of them.

Upon the occurrence of any event of default hereunder, the holder of this Note at his option may declare the entire principal

amount then unpaid hereunder, and all accrued interest thereon, to be forthwith due and payable without further notice of any kind, such notice being hereby expressly waived.

If suit is brought to collect this Note, the Makers shall pay to the holder hereof, in addition to any other amounts which may be due by the Makers to such holder the costs and expenses of collection, including but not limited to attorneys' fees, reasonably incurred by such holder in such connection.

All promises made and obligations assumed by Makers herein shall be deemed made and assumed by them jointly and severally, and any reference in this Note to the "Makers" shall be deemed a reference to both or either of them. This Note shall be binding upon Makers and their respective successors and assigns. This Note shall inure to the benefit of the payees of this Note and their successors and assigns.

I. GURMAN & SONS, INC.

By Robert R. Gurman
Its President

Robert R. Gurman
Robert R. Gurman

INFO REQUEST
#2.

PROMISSORY NOTE

\$133,665.00

Terre Haute, Indiana
January 1, 1992

FOR VALUE RECEIVED, the undersigned I. GURMAN & SONS, INC., an Indiana corporation, and ROBERT R. GURMAN--herein collectively called the "Makers" or individually a "Maker"--promise jointly and severally to pay ISADORE GURMAN and ANNE W. GURMAN, or order, the principal sum of one hundred thirty three thousand six hundred and sixty five and 00/100 dollars (\$133,665.00), together with interest (computed on a 360-day year and 30-day month) from the date of this Note on the unpaid principal balance, until paid, at the rate of nine per cent (9%) per annum. Principal and interest shall be payable at 316 Potomac Avenue, Terre Haute, Indiana or such other place as the holder of this Note may from time to time designate by notice to Makers or either Maker, in one hundred eighty (180) consecutive monthly installments of principal and interest combined of one thousand three hundred fifty five and 72/100 dollars (\$1,355.72) per installment payable on the first day of each month beginning February 1, 1992. Each installment payment shall be applied first on the interest then accrued, then the balance on the principal.

Makers reserve the right at any time and from time to time after June 1, 1992, to prepay the principal amount of this Note in whole or in part without premium or penalty, subject to the provisions hereinafter in this paragraph set forth. Any partial prepayment must be made on the first day of a calendar month and be in the amount of

one thousand three hundred fifty five and 72/100 dollars (\$1,355.72) or any multiple thereof. Any partial prepayment shall be applied against the principal amount outstanding and shall not postpone the due date of any subsequent monthly installments or change the amount of such installments. (However, in the event of one or more partial prepayments, the final installment payable hereunder shall in no event exceed, when made, the then remaining unpaid principal together with interest accrued thereon as aforesaid).

Makers shall pay to the holder of this Note a late charge of two per cent (2%) of any monthly installment not received by the holder within fifteen (15) days after the installment is due.

Makers and all other persons at any time liable for payment of the indebtedness hereunder, whether primarily or secondarily, for themselves, their heirs, executors, administrators, successors and other assigns, expressly waive all applicable exemption rights, whether under the state constitution, homestead laws, or otherwise, and also expressly waive valuation and appraisement, presentment, protest, demand, notice of protest, non-payment and consent to and waive notice of the granting of indulgences or extensions of time of payment, the taking or releasing of security, the addition or release of persons primarily or secondarily liable on or with respect to this Note, all in such manner and at such time or times as the holder hereof may deem advisable. The holder hereof may at any time by written instrument waive any event of default which shall have occurred on the part of Makers. No such written waiver shall extend

to any subsequent or other default. No delay or failure by the holder hereof to exercise any right, power or remedy hereunder shall impair any such right, power or remedy or be construed as a waiver of any default by the Makers or any acquiescence therein.

"Event of default" means in this Note any of the following events, namely:

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- (b) The death of Robert R. Gurman;
- (c) The sale and conveyance, exchange, gratuitous transfer (whether or not in trust), or other disposition, by Robert R. Gurman--or his contracting to sell (whether on a deferred basis or not) or his contracting to otherwise dispose--of the following real estate in Vigo County, Indiana, namely, Lots 1, 2, 3, 4 (except that part thereof conveyed to City of Terre Haute, as shown by instrument dated February 24, 1984, and recorded in Deed Record 396 page 42, records of Recorder's Office of Vigo County, Indiana) 5, 6, 7, and 8 in Block 6 in Linton's Addition to the City of Terre Haute, Indiana; or
- (d) The filing of a petition in bankruptcy or insolvency or for reorganization or for the appointment of a receiver or trustee of all or part of the property of Makers or either of them and the pendency of such proceedings for more than thirty (30) days, or the filing of any such petition by Makers or either of them, or the making of an assignment for the benefit of creditors by makers or either of them.

Upon the occurrence of any event of default hereunder, the holder of this Note at his option may declare the entire principal

amount then unpaid hereunder, and all accrued interest thereon, to be forthwith due and payable without further notice of any kind, such notice being hereby expressly waived.

If suit is brought to collect this Note, the Makers shall pay to the holder hereof, in addition to any other amounts which may be due by the Makers to such holder the costs and expenses of collection, including but not limited to attorneys' fees, reasonably incurred by such holder in such connection.

All promises made and obligations assumed by Makers herein shall be deemed made and assumed by them jointly and severally, and any reference in this Note to the "Makers" shall be deemed a reference to both or either of them. This Note shall be binding upon Makers and their respective successors and assigns. This Note shall inure to the benefit of the payees of this Note and their successors and assigns.

I. GURMAN & SONS, INC.

By Robert R. Gurman
Its President

Robert R. Gurman
Robert R. Gurman



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

#5
#13

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• INC016648230 REACKNOWLEDGEMENT

GURMAN I & SONS INC
PO BOX 1071
TENNE MAUTE

IN 47808

INSTALLATION ADDRESS

400 NORTH 3RD ST
TENNE MAUTE

IN 47808



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

#5
#13

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

49D016648290

I GURMAN & SONS INC
PO BOX 1071
TERRE HAUTE

IN 47808

INSTALLATION ADDRESS

PO BOX 1071
TERRE HAUTE

IN 47808

City of Terre Haute

OFFICE OF THE MAYOR, City Hall

17 Harding Avenue
Terre Haute, Indiana 47807
812-232-9467
Fax 812-232-6346



Judith A. Anderson
Mayor

MODIFIED PERMIT

INDUSTRIAL WASTE DISCHARGE PERMIT

PERMIT #1094

In compliance with the provisions of the Federal Clean Water Act (33 U.S.C. SS1251 et seq.: the "CWA") and the provision of the Terre Haute Sewer Ordinance Chapter IV:

Gurman Container & Supply Corporation

Is authorized to discharge nondomestic wastewater from the permittee's facility located at:

800 North 3rd St
Terre Haute, Indiana 47807

To the collection system of the publicly owned treatment works named:

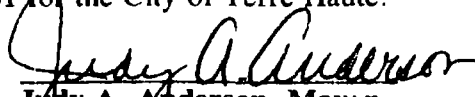
Terre Haute Wastewater Treatment Plant

In accordance with the effluent limitations, monitoring requirements, and other conditions set forth herein.

This permit modification shall be effective October 1, 2001 and expire on November 23, 2002. If the user is not notified by the City of Terre Haute 30 days prior to the expiration of the permit, the permit shall be extended one additional year. The industry shall be informed of any proposed changes in this permit at least 30 days prior to the effective date of change, pursuant to the Terre Haute Sewer Use Ordinance, Chapter IV, Section 4.02.5.

This permit supercedes all nondomestic wastewater discharge permits previously issued. This permit consists of 4 pages in Part I, including effluent limitations, monitoring requirements, etc., and 7 pages in Part II, including General Conditions and Definitions.

Signed this 3 day of OCTOBER, 2001 for the City of Terre Haute.


Judy A. Anderson, Mayor



EA2/SYSTEMS

an American Water Service company

#5

May 7, 2002

Bob Gurman
Gurman Containers & Supply
800 N. 3rd Street
Terre Haute, IN 47807

Dear Bob Gurman:

I am writing in reference to our conversation per your permit being discontinued. After reviews of your monitoring, flow data, and inspections, IDEM and I have deemed it no longer necessary for you to remain a permitted industry based on your current process.

This decision may be revoked at anytime based on future changes of your process stream. It will be your responsibility to notify the Terre Haute Wastewater Treatment Plant and its Industrial Pretreatment Coordinator if there are *any* changes to your current effluent stream that will enter the sanitary sewer system.

Please feel free to contact me at anytime for questions, comments or concerns at (812) 232-6564 extension 18.

Thank you,

Sincerely,
EA2/Systems

Lori Guess
City of Terre Haute
Industrial Pretreatment Coordinator

VERIFICATION OF INSPECTION

This is to verify that on 2/25/98, an inspection of Gurman Container and Supply Corp. was conducted by the

undersigned representatives of the Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management. The inspection was conducted to determine compliance with the Resource Conservation and Recovery Act (RCRA), IC 13-22, and rules promulgated pursuant to those statutes.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned company representatives during the inspection. The company is encouraged to correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations; however, prompt action may be taken into consideration in determining the resolution to any enforcement action which may be taken.

Type of Inspection: ☒ Comprehensive RCRA Hazardous Waste Inspection
☐ Limited RCRA Hazardous Waste Inspection
☐ Complaint
☐ Other: _____

Results of Inspection: ☐ Additional information is required to evaluate overall compliance. You will receive a completed report within 30 days.
☒ In compliance, no violations observed.
☐ In compliance, violations were observed but corrected during the inspection. See inspection report.
☐ Violations were observed and require a follow-up inspection. See inspection report. Re-inspection will be conducted after _____.
☐ Violations were observed and require a submittal. See inspection report. Submittal is due _____.
☐ Violations were observed and are being referred to our Office of Enforcement. See inspection report.
☐ Other: _____

The Indiana Hazardous Waste Rules, 329 IAC 3.1, incorporates by reference federal standards which have been published in the Code of Federal Regulations beginning at 40 CFR 260. Citations reference the federal rules as adopted except where the State rule substitutes full text language, in which case the specific 329 IAC 3.1 citation will be used.

IDEM Representative(s)

Printed Name	Signature	Phone Number	Date
Deborah French	Deborah French	317-233-5745	2/25/98

Company Representative(s)

Printed Name	Signature	Phone Number	Date
ROBERT GURMAN <small>Contact Person</small>	Robert Gurman	800-448-7626	2/25/98
Mailing Address	Ownership	FAX# 612-232-8345	
P.O. Box 1071 TARRENT, INDIANA	SAME		



Frank O'Bannon
Governor

John M. Hamilton
Commissioner

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.idem.org

VIA CERTIFIED MAIL

P 126 000 457

June 22, 1998

Mr. Robert Gurman
Gurman Container and Supply Corp.
P.O. Box 1071
Terre Haute, Indiana 47808

Dear Mr. Gurman:

Re: Return to Compliance
Hazardous Waste Management
Gurman Container and Supply Corp.
EPA I.D. No. IND016648230
Terre Haute, Vigo County

Based upon documents available to the Office of Solid and Hazardous Waste Management during a record review on June 11, 1998, it has been determined that Gurman Container and Supply Corp. has achieved compliance with the terms of the Warning Letter issued to your firm on April 8, 1998.

Thank you for your cooperation. If you have any questions concerning this matter, please contact me at 317/233-5745.

Sincerely,

Deborah French
Environmental Manager
Compliance Section
Hazardous Waste Compliance Branch
Solid and Hazardous Waste Management

cc: Vigo County Health Department

TRIP REPORT

Date: May 5, 2003

Travelers: **Frank Boenzi & Fouad Dababneh**

Destination: Indianapolis, IN

Site Names: **I Gurman & Sons** and **Bi-State Products**

Site/Spill Numbers:

Purpose: Visit state contact, review files, and makes necessary copies.

Locations Visited and Purpose:

Visited Indiana EPA located at 100 N. Senate Avenue, Indianapolis, IN 46206-6015. The purpose was to interview Rich Molini, telephone (317) 233-1512. In addition, we planned on the review of state files and making necessary copies.

Interviews:

Visited Indiana EPA and met with Rich Molini, Environmental Manager, Site Investigation Section, Remediation Services Branch and Dawn M. Groves, State Cleanup Section. Conducted discussions and obtained copies of state files.

Results:

Discussions were conducted with Molini and Groves and appropriate duplicates of state files were obtained. Molini and Groves stated that they would assist, if necessary, EPA's efforts to draft 104 questions. Specifically, questions relating to monitoring well locations would be helpful. Included in discussions was the inspection report completed by the state.

The state has monitoring wells and has hits of TCE and PCE (Trichloroethylene), (Tetrachlorethylene) on I Gurman and BiState properties. PRP's have been identified for both sites. For the time being, Robert Gurman and father are the PRP's for I Gurman & Sons. For BiState, the PRP's are: Ashland Oil going backward to Valvoline, Hans Eilbracht, BiState, Consolidated Recycling Co., and Texaco.

Follow-up:

I am recommending that selected key I Gurman people be interviewed regarding the purchase of drums for refurbishment, contract refurbishment, procedures for disposal of waste materials in the drums when they were received including when, where, how, who. Afterward, perhaps another meeting with state on findings.

With regard to BiState, we should obtain clarification about the details of the tank that was removed between the office building and the old warehouse. This would include

when, who, how, where. Moreover, what was the use of the tank? What evidence exists that documents the distribution of parts cleaning solvents from the facility when it was a petroleum jobber? Obtain a written statement from the owner on the operation of the firm when he owned and operated it including from whom he leased the property, who purchased him out, and what did the new company do when he was bought out. We should attempt to establish a connection between Valvoline and BiState. We should obtain research information on the corporate history of the operation across the street with a title search with chain of title. This operation owned and leased the land to BiState. Finally, and for now, this site will require another visit to the state regarding information Indiana EPA may have on this firm across the street from BiState.

Page: 1

Date: 06/27/03 at 9:46 AM

Gurner Container

Mid-State Chemical & Supply Corp.
Detail Shipments by Customer
Current and History Files Tax Excluded
Cust = GCS

SO #	Item Number	Customer	Slsp	Ship Dte	Shipped Qty Trn Unit U/M	Shipped Value
Location : WHSE1						
** Customer => GCS						
28534	10-FREIGHT	GCS	PATB	03/30/01	1.000 EACH	6.50
28534	SODAASHNAT-BG50	GCS	PATB	03/30/01	2400.000 LB	396.00
30103	10-FREIGHT	GCS	PATB	05/24/01	1.000 EACH	6.50
30103	TRISDPHSCR-BG50	GCS	PATB	05/24/01	500.000 LB	255.00
36539	CAUSTSABD3-D500	GCS	JLW	02/11/02	2500.000 LB	1150.00
36539	TRISDPHSCR-BG50	GCS	JLW	02/11/02	500.000 LB	255.00
45883	TRISDPHSCR-BG50	GCS	JLW	01/21/03	500.000 LB	255.00
49233	10-FREIGHT	GCS	JLW	05/28/03	1.000 EACH	8.00
49233	TRISDPHSCR-BG50	GCS	JLW	05/28/03	500.000 LB	255.00
Subtotal						2587.00
Location : WHSE1 Subtotal						2587.00
Report Total						2587.00

He.

Someone called & asked

*6-27-03 - Ulrich Chem contacted & Requested
Same info. No Response.*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 19 2003

REPLY TO THE ATTENTION OF

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Robert R. Gurman, President/CEO
I. Gurman and Sons, Inc. a/k/a Gurman Container
and Supply Corp.
800 North Third Street
Terre Haute, Indiana 47807

Re: Request for Information Pursuant to Section 104(e) of CERCLA
for I. Gurman and Sons, Inc. a/k/a Gurman Container and
Supply Corp. Site in Terre Haute, Indiana

Dear Mr. Gurman:

The U.S. Environmental Protection Agency (U.S. EPA) is investigating the I. Gurman and Sons, Inc. a/k/a Gurman Container and Supply Corp. Site ("Site") at 800 North Third Street, Vigo County, Terre Haute, Indiana. The U.S. EPA believes that you may have information that is relevant to the investigation of contamination at the Site. Enclosure 1 is a summary of the history of this Site and the results of U.S. EPA's investigation.

The U.S. EPA asks that you provide information and documents relating to the contamination of the Site. Please respond completely and truthfully to this Information Request and its questions in Enclosure 2 within thirty days of your receipt of this letter. Instructions for completion of this response are in Enclosure 3; definitions of terms used in this Information Request and its questions are in Enclosure 4.

You may consider some information that we request as confidential. If you wish to assert a privilege of business confidentiality, you must respond to the question and advise U.S. EPA that you request that the Agency treat the response as confidential business information. Directions to assert a claim of business confidentiality are in Enclosure 5.

The Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §§ 9601, et seq., commonly referred to as CERCLA or Superfund gives the U.S. EPA the authority to:
1) assess contaminated sites, 2) determine the threats to human health and the environment posed by a site, and 3) clean up those sites.

Under § 104(e)(2) of CERCLA, U.S. EPA has authority to gather information and to require persons to furnish information or documents relating to:

A. The identification, nature, and quantity of materials which have been or are generated, treated, stored or disposed of at a vessel or facility or transported to a vessel or facility;

B. The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at/or from a vessel or facility;

C. The ability to pay the costs of the clean up.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to each question within this Information Request and within the prescribed time frame can result in an enforcement action by U.S. EPA pursuant to Section 104(e)(5) of CERCLA, as amended. Failure to respond and failure to justify the non-response can result in similar penalties under this Section. Further, Section 104(e)(5) authorizes the United States to seek penalties from a federal court of up to \$27,500 for each day of continued non-compliance. The U.S. EPA considers non-compliance to be not only failure to respond to the Information Request, but also failure to respond completely and truthfully to each question in the Information Request.

The provision of false, fictitious or fraudulent statements or misrepresentations may subject you or your firm to criminal penalties of up to \$10,000 or up to five 5 years imprisonment, or both, under 18 U.S.C. § 1001.

The U.S. EPA has the authority to use the information requested in an administrative, civil, or criminal action.

This information request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501 et seq.

Return your response to U.S. EPA within 30 days of your receipt of this Information Request. Mail your response to:

Fouad Dababneh
U.S. Environmental Protection Agency
Region 5 (SR-6J)
77 West Jackson Blvd
Chicago, IL 60604-3590

If you have questions about a legal matter please call our attorney, Jose Deleon at (312) 353-7456. Address all other

questions to Fouad Dababneh at (312) 353-3944.

We appreciate your effort to respond fully and promptly to this information request.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas C. Marks", written over a horizontal line.

Thomas C. Marks, Chief
Remedial Enforcement Support Section

Enclosure: 1. Site History
2. Questions
3. Instructions
4. Definitions
5. Confidential Business Information

cc: Rich Molini, IDEM
Dawn Groves, IDEM

ENCLOSURE ONE

SITE HISTORY

The I. Gurman and Sons, Inc. Site is located on the north side of Elm Street between Second and Third Street. The Site extends north to Locust Street and occupies an entire city block. The street address is 800 North Third Street, Terre Haute, Indiana 47807. The Site is rectangular and comprised of three adjacent tax parcels. The Site is occupied by an office-warehouse building, a container storage building, a container reconditioning and processing building, and extensive drum storage areas. The Site is an active facility which currently reconditions barrels and other containers (both steel and plastic). The Site is bounded to the north by a university park/recreational area, to the east by commercial and residential area, and to the south and west by an industrial area.

The I. Gurman and Sons Inc., began operations at the Site in 1922 in which it engaged in repairing and reconditioning of wooden stave barrels. From 1930 to 1980 the majority of the business was the sale and reconditioning of steel barrels. Since 1980, the primary activity has been the sale of paper and plastic containers and the cleaning and reconditioning of customer owned drums.

In 1988, Indiana Department of Environmental Management (IDEM) completed a Screening Site Inspection (SSI) Report at the Site. Sampling results from soil taken during the SSI showed the presence of Volatile Organic Compounds (VOC). In August 1999, and October 2000, IDEM conducted an Expanded Site Inspection at the Site and results from the soil sampling showed presence of VOC such as PCE, TCE, 1,1,1-TCA, and CC14 which were consistent with the VOC identified in the nearby municipal wells.

ENCLOSURE 3

INSTRUCTIONS

1. Answer each of the questions in this Information Request separately.
2. Identify each answer with the number of the question to which it corresponds.
3. In answering each question, identify all persons and contributing sources of information.
4. Although the U.S. EPA seeks your cooperation in this investigation, CERCLA requires that you respond fully and truthfully to this Information Request. False, fictitious, or fraudulent statements or misrepresentations may subject you to civil or criminal penalties under federal law. Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes the U.S. EPA to pursue penalties for failure to respond adequately to requests for submissions of required information.
5. In answering each question, identify all persons and contributing sources of information.
6. You must supplement your response to U.S. EPA if, after submission of your response, additional information should later become known or available. Should you find at any time after the submission of your response that any portion of the submitted information is false or erroneous, you must notify U.S. EPA as soon as possible.
7. For any document submitted in response to a question, indicate the number of the question to which it responds.
8. You must respond to each question based upon all information and documents in your possession or control, or in the possession or control of your current or former employees, agents, contractors, or attorneys. Information must be furnished regardless of whether or not it is based on your personal knowledge, and regardless of the source.
9. Your response must be accompanied by the following statement, or one that is substantially equivalent:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The individual who prepared the response or the responsible corporate official acting on behalf of the corporation must sign and date the statement, affidavit, or certification. Include the corporate official's full title.

10. If any of the requested documents have been transferred to others or have otherwise been disposed of, identify each document, the person to whom it was transferred, and the date and reason for the transfer or disposition.
11. All requested information must be provided notwithstanding its possible characterization as confidential information or trade secrets. If desired, you may assert a business confidentiality claim by means of the procedures described in Enclosure 5.

ENCLOSURE 4

Definitions

1. As used in this letter, words in the singular also include the plural and words in the masculine gender also include the feminine and vice versa.
2. The term **person** as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.
3. **The Site** referenced in these documents shall mean the I. Gurman and Sons, Inc., Site located in Terre Haute, Indiana.
4. The term **hazardous substance** shall have the same definition as that contained in Section 101(14) of CERCLA, including any mixtures of such hazardous substances with any other substances, including petroleum products.
5. The term, **pollutant** or **contaminant**, shall have the same definition as that contained in Section 101(33) of CERCLA, and includes any mixtures of such pollutants and contaminants with any other substances.
6. The term **release** shall have the same definition as that contained in Section 101(22) of CERCLA, and means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance, pollutant, or contaminant.
7. The term **identify** means, with respect to a natural person, to set forth the person's full name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
8. The term **identify** means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
9. The term **identify** means, with respect to a document, to provide its customary business description, its date, its

number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

10. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R., Parts 260-280 and 300, in which case, the statutory or regulatory definitions shall apply.

ENCLOSURE 5

CONFIDENTIAL BUSINESS INFORMATION

You may consider some of the information confidential that the U.S. Environmental Protection Agency (U.S. EPA or Agency) is requesting. You cannot withhold information or records upon that basis. The Code of Federal Regulations at 40 C.F.R. Part 2, Subpart B, requires that the U.S. EPA afford you the opportunity to substantiate your claim of confidentiality before the Agency makes a final determination on the confidentiality of the information.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the U.S. EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when the U.S. EPA receives it, the information may be made available to the public by the Agency without further notice to you. Please read carefully these cited regulations, together with the standards set forth in Section 104(e)(7) of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) because, as stated in Section 104(e)(7)(ii), certain categories of information are not properly the subject of a claim of confidential business information.

If you wish the U.S. EPA to treat the information or record as "confidential", you must advise the U.S. EPA of that fact by following the procedures described below, including the requirement for supporting your claim of confidentiality. To assert a claim of confidentiality, you must specify which portions of the information or documents you consider confidential. Please identify the information or document that you consider confidential by page, paragraph, and sentence. You must make a separate assertion of confidentiality for each response and each document that you consider confidential. Submit the portion of the response that you consider confidential in a separate, sealed envelope. Mark the envelope "confidential", and identify the number of the question to which it is the response.

For each assertion of confidentiality, identify:

1. The period of time for which you request that the Agency consider the information confidential, e.g., until a specific date or until the occurrence of a specific event;
2. The measures that you have taken to guard against disclosure of the information to others;

3. The extent to which the information has already been disclosed to others and the precautions that you have taken to ensure that no further disclosure occurs;

4. Whether the U.S. EPA or other federal agency has made a pertinent determination on the confidentiality of the information or document. If an agency has made such a determination, enclose a copy of that determination;

5. Whether disclosure of the information or document would be likely to result in substantial harmful effects to your competitive position. If you believe such harm would result from any disclosure, explain the nature of the harmful effects, why the harm should be viewed as substantial, and the causal relationship between disclosure and the harmful effect. Include a description of how a competitor would use the information;

6. Whether you assert that the information is voluntarily submitted as defined by 40 C.F.R. § 2.201(i). If you make this assertion, explain how the disclosure would tend to lessen the ability of the U.S. EPA to obtain similar information in the future;

7. Any other information that you deem relevant to a determination of confidentiality.

Please note that pursuant to 40 C.F.R. § 2.208(e), the burden of substantiating confidentiality rests with you. The U.S. EPA will give little or no weight to conclusory allegations. If you believe that facts and documents necessary to substantiate confidentiality are themselves confidential, please identify them as such so that the U.S. EPA may maintain their confidentiality pursuant to 40 C.F.R. § 2.205(c). If you do not identify this information and documents as 'confidential', your comments will be available to the public without further notice to you.

Steve Love

2110 East Aurora Rd

Twinsburg, OH

RT 8 N to ^(R) EAST Aurora Rd

2 Miles on right Chrysler stamping

77 N Turns into RT 8

Straight on Rt 8 10-15 miles

RT 82 ^(R) (east) follow

3 Miles on right Chrysler

Plant Bldg after on R

Go to light + Park

GROUNDWATER TECHNOLOGY, INC.

BESSIE WILLIAMS LANDFILL - PHASE III - EE/CA
NAME, ADDRESS, PHONE, AND FAX LIST

SITE INFORMATION:

Bessie Williams Landfill
2020 Knox Blvd.
Akron, OH 44320
Phone 216-848-9812

POTENTIALLY RESPONSIBLE PARTIES - GENERATORS

NOVACOR CHEMICALS INC.:

Mr. Mark Lesky
Manager, Public Affairs and the Environment
Novacor Chemicals Inc.
690 Mechanics
Leominster, MA 01453
Office 508-537-1111 (x 5085)
Fax 508-840-6073

NON-RESPONSIVE

Sec. Nancy Landry x 5068 - Remediation
Sec. Megan Johnson x 5162 - Calendar

Lindsay Howard, Esquire
Babst, Calland, Clements, and Zomnir
Two Gateway Center
Eighth Floor
Pittsburgh, PA 15222
Office 412-394-5444
Fax 412-394-6576

NON-RESPONSIVE

Sec. Deborah Kaminski

Mr. R.S. Leibel
Plant Supervisor
Novacor Chemicals Inc.
1122 Jacoby Road
Copley, OH 44321
Office 216-666-7996
Fax 216-666-9690

NON-RESPONSIVE

Sec. Denise

U.S. INDUSTRIES, INC.:

Mr. Steve Radel
Project Engineer
Beazer East, Inc.
436 Seventh Avenue
Pittsburgh, PA 15219
Office 412-227-2004
Fax 412-227-2950

NON-RESPONSIVE

Sec. Donna

Stephen Q. Giblin, Esquire
Jones, Day, Reavis and Pogue
North Point
901 Lakeside Avenue
Cleveland, OH 44114
Office 216-586-7155
Fax 216-579-0212

NON-RESPONSIVE

Sec. Pat Lavin 216-586-1398

CONTRACTOR

GROUNDWATER TECHNOLOGY, INC.:

Mr. Mark Urbassik, P.E.
Principal-in-Charge
Groundwater Technology, Inc.
600 Clubhouse Dr., Suite 200
Moon Township, PA 15108
Office 412-299-7251
Fax 412-299-0461

Mr. Harry V. Myers, P.E.
Project Manager
Groundwater Technology, Inc.
600 Clubhouse Dr., Suite 200
Moon Township, PA 15108
Office 412-299-7275
Fax 412-299-0461

Mr. Bruce Shaw
Project Site Coordinator/Hydrogeologist
Groundwater Technology, Inc.
600 Clubhouse Dr., Suite 200
Moon Township, PA 15108
Office 412-299-7204
Fax 412-299-0461

ENCLOSURE TWO

INFORMATION REQUESTS

1. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any materials at the Site? If the answer to the preceding question is anything but an unqualified "no", identify:
 - a) the chemical composition, characteristics, physical state (e.g., solid, liquid) of each material;
 - b) who supplied you with such material;
 - c) how you used, purchased, generated, stored, treated, transported, disposed of or otherwise handled such materials;
 - d) when you used, purchased, generated, stored, treated, transported, disposed of or otherwise handled such materials;
 - e) where you used, purchased, generated, stored, treated, transported, disposed of or otherwise handled such materials; and
 - f) the quantity of such materials used, purchased, generated, stored, treated, transported, disposed of or otherwise handled by you.
2. State the dates during which you owned, operated, or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g., including but not limited to purchase and sale agreements, deeds, leases, etc.) and provide copies of all documents evidencing or relating to such ownership.
 - a) Identify all supervisory personnel assigned to the Site during your firm's ownership, operation or lease of the Site and the tenure of each person discussed in the preceding question. For each person identified, describe to the best of your knowledge and belief, the duties and responsibilities of such person(s) and the tasks performed by each person identified.
3. Identify the prior owners of the Site. For each prior owner, further identify:
 - a) the dates of ownership;
 - b) all evidence showing that they controlled access to the Site; and

- c) all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Site during the period that they owned the Site.
4. Identify the prior operators, including lessors, of the Site. For each such operator, further identify:
- a) the dates of operation;
 - b) the nature of prior operations at the Site;
 - c) all evidence that they controlled access to the Site; and
 - d) all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Site and/or its solid waste units during the period that they were operating the Site.
5. Provide copies of all local, state, and federal environmental permits ever granted for the facility or any part thereof (e.g., RCRA permits, NPDES permits, etc.).
6. Identify any persons who concurrently with the owner/operator exercised actual control or who held significant authority to control activities at the Site/facility/plant, such as:
- a. partners or joint venturers;
 - b. any contractor, subcontractor, or licensor with any presence or activity on the Site; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities;
 - c. any person subleasing land, equipment or space on Site;
 - d. any person with regular activities at the Site or who used easements, such as utilities, pipelines, and railroads, at the Site;
 - e. major financiers and lenders;
 - f. any person who exercised actual control over any activities or operations at the Site or who held authority to control activities or operations at the Site; and

- g. government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Site/facility/plant;
7. Identify any legal or equitable interest that you now have, or previously had in the Site. Include information regarding the nature of such interest; when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest.
 8. If you are the current owner and/or current operator, did you acquire or operate the Site or any portion of the Site after the disposal or placement of hazardous substances on or at the Site? Describe all of the facts on which you base the answer to the preceding question.
 9. At the time you acquired or operated the Site, did you know or have reason to know that any hazardous substance was disposed of on or at the Site? Describe all investigations of the Site you undertook prior to acquiring the Site and all of the facts on which you base the answer to the preceding question.
 10. Describe the nature of your activities or business at the Site with respect to purchasing, receiving, processing, storing, treating, disposing, or otherwise handling hazardous substances or materials at the Site.
 11. Identify all federal, state and local authorities that regulated the Site Operator and/or that interacted with the Site Operator. Your response must address all interactions and, in particular, all contacts from agencies/departments that dealt with health and safety issues and environmental concerns.
 12. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning the Site between and 1922 to present. Provide copies of all documents associated with such an occurrence.
 13. Did the I. Gurman and Sons Inc., ever file a Hazardous Waste Activity Notification under the Resource Conservation and Recovery Act (RCRA)? If so, provide a copy of such notification.
 14. Did the I. Gurman and Sons Inc., ever have "interim status" under the RCRA? If so, and I. Gurman and Sons Inc., does not currently have interim status, describe the circumstances under which it lost interim status.

15. Provide all reports, information or data related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.
16. Describe the acts or omissions of any persons other than your employees, agents or those persons with whom you had a contractual relationship, that may have caused the release or threat of release of hazardous substances at the Site and identify such persons. In addition:
 - a. Describe all precautions that you took against foreseeable acts or omissions of any such third parties and the consequences that could foreseeably result from such acts or omissions; and,
 - b. Describe the care you exercised with respect to the hazardous substances found at the Site.
17. Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on the Site. For each such solid waste management unit, provide the following information:
 - a. a map showing the unit's boundaries and the location of all known solid waste management units, whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;
 - b. the type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit;
 - c. the dates that the unit was in use;
 - d. the purpose and past usage of the unit (e.g., storage, spill containment, etc.);
 - e. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit;
 - f. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit; and

- g. If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.
18. Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants that have occurred at or from the Site. In addition, identify:
- a. when such releases occurred;
 - b. how the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred to or from any tanks, drums, barrels, or recovery units, and treated);
 - c. the amount of each hazardous substance, or contaminant released;
 - d. where such releases occurred;
 - e. any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
 - f. any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken; and
 - g. all persons with information relating to these releases.
19. Has any contaminated soil ever been excavated or removed from the Site? Unless the answer to the preceding question is anything besides an unequivocal "no", identify:
- a. the amount of soil excavated;
 - b. the location of excavation;
 - c. the manner and place of disposal and/or storage of excavated soil;
 - d. the dates of soil excavation;
 - e. the names and affiliations of persons who excavated or removed the soil;
 - f. the reason for soil excavation;

- g. whether the excavation or removed soil contained hazardous substances and why the soil contained such substances;
 - h. all analyses or tests and results of analyses of the soil that was removed from the Site; and
 - i. all persons, including contractors, with information about (a) through (h) of this request.
20. Provide all information, including evaluations, safety audits, and correspondence concerning insurance issues at the Site.
21. Describe the waste generation history of the Site, including all controlled and uncontrolled releases of compounds, reactants, products, waste, and any other substance. In your response list all releases by compound, the amount of release and the circumstances surrounding said releases.
22. Describe all instances where the Site accepted waste from any company or person, or where the Site accepted substances which could be considered hazardous in their present form. Include the following in your response:
- a. a description of the waste sent to the Site;
 - b. the types and quantity of the waste sent to the Site;
 - c. the name of the person or company who transported the waste to the Site;
 - d. the name of the person or company who sent the waste to the Site;
 - e. the names of the person or company who originated the waste sent to the Site;
 - f. the date(s) such wastes were sent to the Site;
 - g. the state (i.e., liquid, solid, or gaseous) of the wastes sent to the Site, and the manner in which the wastes were stored or disposed (i.e., drummed or uncontained, placed in lagoons, landfilled, placed in piles, etc.); and,
 - h. a description of what the Site would do with the waste once received.

23. For all companies, firms, facilities and individuals identified in response to information request 22, above, provide the following information:

- a. the location and address of each such company or person who sent such materials, including contact person(s) within said companies;
- b. shipping records pertaining to such materials sent by each such company or person, including but not limited to invoices, bills of lading, weight tickets, and purchase orders; and
- c. identification and location of all companies and individuals who transported said materials.

Bessie Williams Landfill

2/19/03

<u>Name</u>	<u>Representing</u>	<u>Telephone</u>	<u>E-mail</u>
Tom Kenney	U.S. EPA / ORC	(312) 886-0708	Kenney.Thomas@epa.gov
Tom Williams	U.S. EPA / RPM	(312) 886-6157	WILLIAMS.THOMAS@epa.gov
Fouad Dababneh	U.S. EPA	(312) 353-3944	Dababneh.Fouad@epa.gov
Russ Dezellan	Owner	330-723-5477	RDezellan@AOL.com
Gwen Massenburg	USEPA / RPM	312-886-0983	Massenburg.gwendolyn@epa.gov
DARRYL OWENS	USEPA / RPM	312-886-7089	Owens.darryl@epa.gov
Zenny Sadlon	USEPA / CIC	(312) 886-6682	Sadlon.Zenny@epa.gov
David Kerschner	KU Resources	412-469-9381 x12	dkerschner@kresources.com
Lindsay Howard	Babst, Calland for NAVA chemicals	412 394-5444	LHoward@buz.com
STEPHEN Q. GIBLIN	JONES DAY	216-586-7155	sggiblin@jonesday.com
Lori Salser	Copley Top.	330 666-1853	lsalser@copley.ch.us
Lawrence Antonelli	Ohio EPA	330 963-1127	
Ed Messing	U.S. EPA / ORC	312-353-8892	messing.Edward@epa.gov
John Rice	MHC	513 530 6563	John.Rice@millenniumche.com

Next Step

1) Another round of 104(c) - Financial Overhaul

2)

Q# 19

1) ^{suspected} Contaminated soil excavation
- removed at the site

* May need to do sampling of soil in
that area one test for ^{140.7} contaminants

Q to State: Did the expanded inspection
report include samples of the
suspected contaminated soil
excavation area?

2) Page 2-7 indicates that the State is also
implicating another company Machine Tool
Service First Recovery